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**SUPREME COURT  
STATE OF NEVADA**

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Electronically Filed  
Feb 04 2022 03:36 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

COMPLETE CARE CONSULTING, LLC,  
Appellant,

vs.

SHANNON M. CHAMBERS, in her capacity  
as the Labor Commissioner of the State of  
Nevada; and the STATE OF NEVADA,  
OFFICE OF THE LABOR COMMISSIONER,  
Respondents.

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MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF

COMES NOW, Appellant Complete Care Consulting, LLC, by and through undersigned counsel, and moves this Court for an extension of time to file its Reply Brief. This motion is brought pursuant to NRAP 26(b)(1)(A).

The undersigned is requesting additional time in which to file the Reply Brief. Respondents filed a dispositive motion before the District Court that

resulted in the dismissal of Appellant's petition for judicial review – which is the subject of this appeal. Based on the way in which the dismissal order was drafted, Respondents have presented an argument supporting the dismissal order that was not presented in the original dispositive motion. This matter also potentially involves a novel issue of whether a district court can remand an issue if it dismisses for lack of jurisdiction. To fully address these and the other issues, the undersigned finds that additional time is needed to conduct additional research to fully prepare the Reply Brief.

Based on the preceding, the undersigned is requesting additional time through March 7, 2022 in which to file the Reply Brief.

Dated this 4<sup>th</sup> day of February, 2022.

/s/ Brian Morris

Brian R. Morris, Esq.

Attorney for Appellant Complete Care Consulting, LLC

### Certificate of Service

Pursuant to NRAP 25(b), I certify that on February 4, 2022, I electronically filed the preceding document with the Clerk of the Court by using the e-filing system, which will send a notice of electronic filing to Ms. Andrea Nichols.

/s/ Brian Morris

Brian R. Morris, Esq.

Attorney for Appellant Complete Care Consulting, LLC