

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

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SUNRISE VILLAS IX HOMEOWNERS  
ASSOCIATION,

Appellant,

vs.

SIMONE RUSSO,

Respondent.

**Case No. 83-115** Electronically Filed  
Apr 07 2022 12:06 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**MOTION FOR EXTENSION OF TIME FOR OPENING BRIEF AND  
APPENDIX (first request)**

Appellant hereby moves for a 30-day extension of time for the opening brief and appendix, which are now due on April 25, 2022. Appellant seeks an extension until May 25, 2022. This is appellant's first request for an extension.

This is an appeal from post-judgment orders in a personal injury case. The underlying judgment is in the amount of \$25 million. The district court proceedings were highly unusual. Among other things, there was a partial settlement; a dispute concerning the scope and application of the settlement; a district court order determining that a portion of the settlement agreement is null and void; a default prove-up hearing that resulted in the \$25 million judgment; and proceedings on appellant's motion to set aside the judgment (which the district court denied).

Because of the highly unusual district court proceedings, the legal issues in this appeal are unusually complex and uncommon—in large part constituting issues of first impression in Nevada. The complexity of the appeal is reflected in the fact that the appendix will likely consist of at least 17 volumes, with at least 3,700 pages.

Appellant's lead appellate counsel, Robert Eisenberg, has been reading and digesting the lengthy record. Eisenberg has started work on the opening brief, but he has only been able to scratch the surface of all the work that needs to be done. And once a draft opening brief is prepared, it will need to undergo significant review and input by other attorneys on appellant's legal team.

Since the date on which this court reinstated briefing (January 25, 2022), counsel Eisenberg has had other important commitments that took time away from his ability to prepare the opening brief in this case. In addition to his regular caseload, he volunteers as the attorney coach for a high school mock trial team in Reno. His team participated in a regional competition on February 17-18, and in the State competition on March 3-4, 2022. This required a very significant commitment of Eisenberg's time during the weeks leading up to the two competitions. Also, since briefing was reinstated, Eisenberg had an out-of-town trip that had been planned for several months, and he had some medical issues that took time away from work. And he is a member of the NRAP Revision Commission, which has also taken time away from his regular work.

Under these circumstances, appellant contends that good cause exists for the extension. This motion is being made in good faith and without any intent to delay the appeal unnecessarily.

Dated: April 7, 2022

*s/ Robert L. Eisenberg*  
ROBERT L. EISENBERG (SBN 950)  
LEMONS, GRUNDY & EISENBERG  
6005 Plumas Street, Third Floor  
Reno, NV 89519  
775-786-6868  
775-786-9716 fax  
[rle@lge.net](mailto:rle@lge.net)  
*ATTORNEYS FOR APPELLANT*

**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of LEMONS, GRUNDY & EISENBERG, and on this date the foregoing document was electronically filed with the Clerk of the Nevada Supreme Court, and therefore electronic service was made in accordance with the master service list as follows:

David Sampson  
Shannon Splaine

DATED: April 7, 2022

/s/ Margie Nevin  
Margie Nevin