

**In the Supreme Court of Nevada**

UNITE HERE HEALTH, a multi-employer health and welfare trust, as defined in ERISA Section 3(37); and NEVADA HEALTH SOLUTIONS, LLC, a Nevada limited liability company,

Petitioners,

*vs.*

THE EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA, in and for the County Clark; and the HONORABLE TIMOTHY C. WILLIAMS, District Judge,

Respondents,

THE STATE OF NEVADA COMMISSIONER OF INSURANCE, BARBARA D. RICHARDSON, in her official capacity as Receiver for the Nevada Health Co-op,

Real Parties in Interest.

Electronically Filed  
Nov 01 2021 06:17 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**MOTION FOR EXTENSION OF TIME TO FILE ANSWER**

Real parties in interest request an extension through December 1, 2021, to file their answer. NRAP 31(b)(3). This is the second such request. Without an extension, the brief would be due November 1, 2021. No requests for extension have been denied or denied in part.

Counsel have prepared a draft of the answer. Nevertheless, good cause and extraordinary circumstances necessitate the extension.

The primary drafting attorney has just returned from family leave last week and was unable to assist, including because of having to care for his infant son, who underwent a minor surgical procedure, as well as for his wife and five-year-old daughter, who both became ill. The attorney himself also experienced severe back pain for about two weeks but has improved significantly. While they have been recovering, however, the attorney has been unable to devote significant time to this brief. Other lawyers have assisted in his absence, but have been stretched thin with the increased workload, two jury trials, and lead counsel's pre-planned travel to the Fall Meeting of the American Academy of Appellate Lawyers, where he serves as the Academy's president.

The additional time will allow counsel to distill the issues and present the facts as succinctly as possible. The Court's courtesy under the circumstances is greatly appreciated.

Dated this 1st day of November, 2021.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

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*Attorneys for Real Parties in Interest*

**CERTIFICATE OF SERVICE**

I certify that on November 1, 2021, I submitted the foregoing “Motion for Extension of Time to File Answer” for filing *via* the Court’s eFlex electronic filing system. Electronic notification will be sent to the following:

John R. Bailey  
Dennis L. Kennedy  
Sarah E. Harmon  
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*Attorneys for Petitioners*

I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage prepaid, at Las Vegas, Nevada, addressed as follows:

The Honorable Timothy C. Williams  
DISTRICT COURT JUDGE – DEPT. 16  
200 Lewis Avenue  
Las Vegas, Nevada 89155

*Respondent*

/s/ Cynthia Kelley  
An Employee of Lewis Roca Rothgerber Christie LLP