

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 24 2021 11:01 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

**MOTION FOR EXTENSION OF TIME
TO FILE RESPONSE TO MOTION TO STAY**

Real parties in interest request an extension through December 8, 2021, to file their response to petitioners' motion to stay. NRAP 26(b)(1)(a). This is the first such request. Without an extension, the response would be due November 24, 2021.

Good cause necessitates the extension.

While trial counsel with Greenberg Traurig are taking the lead in

the proceedings in the district court, of necessity appellate counsel with Lewis Roca are primarily addressing the questions in this writ petition. Those counsel, however, have been in trial and have had to juggle multiple hearings during breaks, detracting from their ability to address the motions. This past week was particularly difficult with the preparation of jury instructions through evenings and the weekends and a number of other emergencies—all on top of counsel’s ordinary workload. Although counsel had expected the trial to conclude earlier, they have had to be involved through today—including to answer the jury’s questions and prepare for a possible second phase of trial.

The Court’s courtesy under the circumstances is greatly appreciated.

Dated this 24th day of November, 2021.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/Abraham G. Smith
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CERTIFICATE OF SERVICE

I certify that on November 24, 2021, I submitted the foregoing
“Motion for Extension of Time to File Response to Motion for Stay” for
filing *via* the Court’s eFlex electronic filing system. Electronic notifica-
tion will be sent to the following:

John R. Bailey
Dennis L. Kennedy
Sarah E. Harmon
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8984 Spanish Ridge Avenue
Las Vegas, Nevada 89148

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/ Jessie M. Helm
An Employee of Lewis Roca Rothgerber Christie LLP