

IN THE SUPREME COURT OF THE STATE OF NEVADA

SPANISH HEIGHTS ACQUISITION
COMPANY, LLC; SJC VENTURES
HOLDING COMPANY, LLC, d/b/a SJC
VENTURES, LLC,

Petitioners,

v.

CBC PARTNERS I, LLC; A FOREIGN
LIMITED LIABILITY COMPANY;
AND 5148 SPANISH HEIGHTS, LLC;
A NEVADA LIMITED LIABILITY
COMPANY,

Respondents.

Electronically Filed
Mar 25 2022 01:53 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Supreme Court No. 83407
District Court Case No. A-20-813439-B

**MOTION FOR EXTENSION OF TIME TO FILE
RESPONDENTS' ANSWERING BRIEF**

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**MOTION FOR EXTENSION OF TIME TO FILE
RESPONDENT’S ANSWERING BRIEF**

Respondents, CBC Partners I, LLC and 5148 Spanish Heights, LLC, pursuant to NRAP 31(b)(3), by and through its attorneys of record, the law firm Mushkin & Coppedge, hereby requests 30 days, through April 25, 2022,¹ to file their Answering Brief. This is the first written request by the Real Parties for an extension of time. A telephonic extension was requested and granted on March 11, 2022, the original date the Answering Brief was due. The Response is currently due on March 25, 2022. No written extensions have been denied or denied in part.

Additional time is needed as L. Joe Coppedge was the attorney primarily responsible for preparing the Answering Brief; however, Mr. Coppedge had a medical emergency which required hospitalization and surgery. See Declaration of L. Joe Coppedge. During his recovery, Mr. Coppedge has not had sufficient time to prepare Respondent’s Answering Brief. Due to this unexpected and unavoidable circumstance, counsel for Respondents would not be able to address all of the issues comprehensively and thoroughly.

Respondents respectfully submits that Appellants will suffer no prejudice as a result of this requested extension. The undersigned respectfully requests that the

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¹ 30 days from March 25, 2022 is April 24, 2022; the next Judicial day is April 25, 2022.

Court allow 30 additional days, through April 25, 2022, to prepare, file and serve the Answering Brief.

DATED this 25th day of March, 2022.

MUSHKIN & COPPEDGE

/s/Michael R. Mushkin

MICHAEL R. MUSHKIN, ESQ.

Nevada Bar No. 2421

L. JOE COPPEDGE, ESQ.

Nevada State Bar No. 4954

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**DECLARATION OF L. JOE COPPEDGE IN SUPPORT OF
MOTION FOR EXTENSION OF TIME**

Declarant, upon penalty of perjury, states as follows:

1. I am an attorney with the law firm of Mushkin & Coppedge, attorneys for the Respondents, CBC Partners I, LLC and 5148 Spanish Heights, LLC.

2. I make this declaration in support of the Respondent's Motion for an Extension of Time.

3. Although Mr. Mushkin is lead counsel on this matter, I was the attorney primarily responsible for preparing the Answering Brief.

4. I was hospitalized on March 9, 2022 at Centennial Hills Hospital where I had emergency surgery performed on March 10, 2022.

5. I was discharged from the hospital the following day on March 11, 2022.

6. During my recovery, I have not been able to prepare the Answering Brief.

7. Should the Court require more information regarding my medical condition and treatment, I'm happy to provide additional information in an in camera setting.

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 25th day of March, 2022.

/s/L. Joe Coppedge
L. JOE COPPEDGE

CERTIFICATE OF SERVICE

Pursuant to NRAP 25(d), I certify that on this 25th day of March, 2022, I served a true and correct copy of the foregoing **Motion For Extension of Time to File Answering Brief** as follows:

- ☐ [] by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;
- ☒ [X] via electronic means by operation of the Court's electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk;
- ☐ [] via hand-delivery to the addressee listed below;
- ☐ [] via facsimile;
- ☐ [] by transmitting via email to the email address set forth below.

/s/Karen L. Foley
An Employee of
Mushkin & Coppedge