IN THE SUPREME COURT OF THE

STATE OF NEVADA

5550 PAINTED MIRAGE RD., LLC,

Appellant,

Electronically Filed Aug 02 2022 02:55 p.m. Elizabeth A. Brown Clerk of Supreme Court

VS

TRAVELERS CASUALTY AMERICA, PROPERTY COMPANY OF

Respondent.

Supreme Court Case No. 83413

District Court Case: A-19-803425-C

MOTION FOR EXTENSION OF TIME TO FILE OPENING BRIEF

LAW OFFICE OF MITCHELL STIPP MITCHELL STIPP, ESQ. (Nevada Bar No. 7531) 1180 N. Town Center Drive, Suite 100 Las Vegas, Nevada 89144

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MEMORANDUM OF POINTS AND AUTHORITIES

Appellant, 5550 Painted Mirage Rd., LLC, a Nevada limited liability company ("Appellant"), requests an extension to file its opening brief pursuant to NRAP 31(b)(3).

As required by NRAP 31(b)(3), Appellant confirms the following:

- (i) The date when the brief is due: August 3, 2022.
- (ii) The number of extensions of time previously granted (including a 14-day telephonic extension), and if extensions were granted, the original date when the brief was due: Appellant previously requested one 14-day telephonic extension to the original due date of July 20, 2022, which was granted.
- (iii) Whether any previous requests for extensions of time have been denied or denied in part: **No**.
- (iv) The reasons or grounds why an extension is necessary (including demonstrating extraordinary and compelling circumstances under Rule 26(b)(1)(B), if required): The representative for Appellant, Dr. Daniel Taheri, has been unavailable to assist with the preparation of Appellant's brief due to his unexpected travel outside of the country to locations with limited or no access to email or cellular service. Dr. Taheri is planning to return to the United States on or before August 19, 2022.

(v) The length of the extension requested and the date on which the brief would become due: Appellant requests an extension of thirty (30) days, which if granted would make the opening brief due on September 2, 2022.

For the reasons set forth above, Appellant requests that its request for an extension be granted.

DATED this 2nd day of August, 2022

LAW OFFICE OF MITCHELL STIPP

/s/ Mitchell Stipp

MITCHELL STIPP, ESQ. Nevada Bar No. 7531 1180 N. Town Center Drive Suite 100 Las Vegas, Nevada 89144 Telephone: (702) 602-1242 mstipp@stipplaw.com Counsel for Appellant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 2nd day of August, 2022, I filed the foregoing **Motion,** using the court's electronic filing system.

Notice of the filing was made upon acceptance by the Nevada Supreme Court to the following e-service participants:

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By: /s/ Amy Hernandez

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