

**In the Supreme Court of Nevada**

BARRICK GOLD CORPORATION,  
Petitioner,

*vs.*

EIGHTH JUDICIAL DISTRICT COURT of the  
State of Nevada, in and for the County of  
Clark; and the Honorable ELIZABETH  
GOFF GONZALEZ, District Judge,

Respondents,

and

BULLION MONARCH MINING, INC.,  
Real Party in Interest.

Electronically Filed  
Feb 07 2022 09:54 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

District Court  
Case No. A785913

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

Bullion Monarch Mining, Inc. requests an extension through March 9, 2022, to file its answer to the petition. NRAP 31(b)(3). This is the second such motion following the parties' stipulation. Without an extension, the brief would be due February 7, 2022. No requests for extension have been denied or denied in part.

Extreme circumstances necessitate the extension. Lead appellate counsel, in addition to having to deal with his own health problems, had to care for a sick family member and his grandchild. Counsel have also faced a shortage of attorneys to assist with this and other briefs. In the

district court in this case, Bullion's counsel have had to focus on the preparation of three summary judgment motions and oppositions to seven summary-judgment motions by Barrick. To meet the demand, counsel engaged counsel from other offices, all of whom had to be brought up to speed on this complex matter. Unfortunately, those district-court proceedings made it challenging to complete the answer in these writ proceedings. And while counsel understands that their caseload, without other reasons, may not justify an extension, counsel had to assist on an emergency basis with another case where confidential trade secrets of a Fortune 10 company and its subsidiaries are being threatened to be released to the public domain. This was on top of another appellate brief that needed to be filed today.

Counsel remain optimistic that despite these setbacks, they will prepare and file the brief before the requested deadline. The Court's consideration of this extension is greatly appreciated.

Dated this 7th day of February, 2022.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/Abraham G. Smith

DANIEL F. POLSENBERG (SBN 2376)

JOEL D. HENRIOD (SBN 8492)

ABRAHAM G. SMITH (SBN 13250)

3993 Howard Hughes Parkway

Suite 600

Las Vegas, Nevada 89169

(702) 949-8200

CLAY P. BURST (SBN 5234)

ROBISON SHARP SULLIVAN & BURST

71 Washington Street

Reno, Nevada 98503

*Attorneys for Real Party in Interest*

**CERTIFICATE OF SERVICE**

I certify that on February 7, 2022, I submitted the foregoing  
“Motion for Extension of Time to Answer to Petition” for filing *via* the  
Court’s eFlex electronic filing system. Electronic notification will be  
sent to all participants.

JAMES J. PISANELLI  
TODD L. BICE  
DEBRA L. SPINELLI  
JORDAN T. SMITH  
PISANELLI BICE PLLC  
400 S. 7th Street, Ste. 300  
Las Vegas, Nevada 89101  
(702) 214-2100

MICHAEL R. KEALY  
ASHLEY C. NIKKEL  
50 West Liberty Street, Ste. 750  
Reno, Nevada 89501

BRANDON J. MARK (*pro hac vice*)  
PARSONS BEHLE & LATIMER  
201 S. Main Street, Suite 1800  
Salt Lake City, Utah 84111

*Attorneys for Petitioner*

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 Joanna S. Kishner  
Eighth Judicial District Court, Dept. XXXI, Regional Justice Center  
200 Lewis Avenue  
Las Vegas, NV 89155

*Respondent*

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