

In the Supreme Court of Nevada

UNITED HEALTHCARE INSURANCE COMPANY,
UNITED HEALTH CARE SERVICES, INC., UMR,
INC., SIERRA HEALTH AND LIFE INSURANCE
COMPANY, INC., HEALTH PLAN OF NEVADA,
INC.,

Petitioners,

vs.

THE EIGHTH JUDICIAL DISTRICT COURT of the
State of Nevada, in and for the County of
Clark; and THE HONORABLE NANCY L. ALLF,
District Judge,

Respondents,

and

FREMONT EMERGENCY SERVICES
(MANDAVIA), LTD., TEAM PHYSICIANS OF
NEVADA-MANDAVIA, P.C., CRUM STEFANKO
AND JONES, LTD.,

Real Parties in Interest.

Electronically Filed
Oct 24 2021 08:19 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

**MOTION TO EXCEED PAGE LIMIT
FOR REPLY ON NRAP 27(E) EMERGENCY MOTION TO STAY
ENFORCEMENT OF SUBPOENAS PENDING PETITION
and
MOTION FOR INTERIM STAY**

Petitioners request leave under NRAP 27(d)(2) to file a reply on their NRAP 27(e) emergency motion to stay and motion for interim stay in excess of five pages. The reply is 8 pages long. The additional pages are needed to address the new argument that only the out-of-state

witnesses have standing to challenge the Rule 45 subpoenas and to provide supporting appendix citations and authority.

To give this Court the information it needs, petitioners request permission to exceed the 5-page limit. NRAP 32(a)(7)(D).

Dated this 24th day of October, 2021.

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**DECLARATION OF DANIEL F. POLSENBERG
IN SUPPORT OF MOTION TO EXCEED PAGE LIMIT**

STATE OF NEVADA }
COUNTY OF CLARK }

1. I, Daniel F. Polsenberg, under penalty of perjury, declare that I am a Nevada licensed lawyer with Lewis Roca Rothgerber Christie LLP and that I am counsel for petitioners.

2. Petitioners request leave under NRAP 27(d)(2) to file a reply that exceeds the 5-page limit in NRAP(32)(a)(7)(A)(ii) by 3 pages.

3. Petitioners believe that the additional pages are necessary to give this Court the information it needs. In particular, petitioners had to respond to a new argument that they lacked standing to challenge the Rule 45 subpoenas. The excess pages are needed to address the arguments and provide the necessary authority and record citations that explain why that argument is erroneous.

Dated this 24th day of October, 2021.

/s/ Daniel F. Polsenberg
DANIEL F. POLSENBERG

CERTIFICATE OF SERVICE

I certify that on October 24, 2021, I submitted the foregoing
“Motion to Exceed Page Limit for Reply on NRAP 27(e) Emergency
Motion to Stay Enforcement of Subpoenas Pending Petition *and* Motion
for Interim Stay” for filing *via* the Court’s eFlex electronic filing system.

Electronic notification will be sent to the following:

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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 Nancy L. Alf
DISTRICT COURT JUDGE – DEPT. 27
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