

IN THE SUPREME COURT OF THE STATE OF NEVADA

ASPEN SPECIALTY INSURANCE
COMPANY,

Petitioner,

v.

THE EIGHTH JUDICIAL DISTRICT
COURT OF THE STATE OF NEVADA,
IN AND FOR THE COUNTY OF
CLARK; and THE HONORABLE
GLORIA STURMAN, DISTRICT JUDGE,
DEPT. 26,

Respondents,

ST. PAUL FIRE & MARINE
INSURANCE COMPANY; NATIONAL
UNION FIRE INSURANCE COMPANY
OF PITTSBURGH, PA; and ROOF DECK
ENTERTAINMENT, LLC d/b/a
MARQUEE NIGHTCLUB

Real Parties in Interest.

Electronically Filed
May 02 2022 01:44 p.m.
Elizabeth A. Brown
Clerk of Supreme Court
Supreme Court Case No. 83794

***Related to Nevada Supreme Court
Case No. 81344***

District Court Case No. A-17-758902-C

**PETITIONER ASPEN
SPECIALTY COMPANY'S
MOTION
FOR EXTENSION OF TIME TO
FILE REPLY BRIEF
[SECOND REQUEST]**

Petitioner Aspen Specialty Company respectfully moves this Court for an extension of time of a period of fourteen (14) days through May 19, 2022 to file its Reply brief. The Reply is presently due to be filed on or before May 5, 2022. This is Petitioner's second request for extension.

Petitioner notes that the issues presented in this matter are extraordinarily complex, and real party in interest, St. Paul Fire & Marine Company's ("St. Paul")

Answer was itself prepared with the benefit of a 60-day extension. Unforeseen circumstances have arisen in the past several weeks with respect to counsel, including the death of a family member, personal illness, and staff changes. Given the significant amounts at stake in this writ petition, as well as the inherent complexity of the multiple issues of first impression being presented to this Court, counsel requests a 14-day extension to properly give them an opportunity to prepare a response, as well as to give the client the opportunity to review and approve the final Reply before filing. Counsel will make every effort to finalize such preparation and revisions as soon as possible so as not to delay the proceedings.

Pursuant to the stipulation of the parties, this Court granted St. Paul a 60-day extension from the date its Answer was due. Upon its request, St. Paul has stipulated to a 14-day extension from the current due date for Petitioner to file its Reply.

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This request is presented in good faith and not for the purposes of delay or any other improper reason.

Respectfully submitted this 2nd day of May, 2022.

MESSNER REEVES LLP

/s/Michael M. Edwards

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CERTIFICATE OF SERVICE

I certify that I am an employee of Messner Reeves LLP and that on this date the foregoing **PETITIONER ASPEN SPECIALTY COMPANY'S MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF (SECOND REQUEST)** was filed electronically with the Clerk of the Nevada Supreme Court, and therefore electronic service was made in accordance with the master service list as follows:

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DATED this 2nd day of May, 2022.

/s/ Laurie Moreno
An Employee of Messner Reeves LLP