

IN THE SUPREME COURT OF THE STATE OF NEVADA

LEO KRAMER; AND AUDREY KRAMER,)	Supreme Court No. 82379
)	
)	Electronically Filed
)	Aug 09 2021 10:32 a.m.
Appellants,)	Elizabeth A. Brown
)	Clerk of Supreme Court
)	RESPONDENT
v.)	BRECKENRIDGE PROPERTY
)	FUND 2016, LLC'S MOTION
NATIONAL DEFAULT SERVICING CORPORATION; ALYSSA MCDERMOTT; AND)	FOR AN EXTENSION OF
BRECKENRIDGE PROPERTY FUND)	TIME TO FILE ANSWERING
2016, LLC,)	BRIEF
)	(FIRST REQUEST)
)	
Respondents.)	
<hr style="width: 40%; margin-left: 0;"/>)	

Respondent Breckenridge Property Fund 2016, LLC, respectfully moves this Court for an extension of time for a period of 30 days from the current due date within which to file its answering brief. The answering brief is presently due to be filed on or before August 16, 2021. This extension of time would make the reply brief due on or before September 15, 2021. This is respondents first request for an extension of time.

On July 20, 2021, appellate counsel for respondents, Michael K. Wall, of Hutchison & Steffen passed away after his short battle with COVID-19.

As a result, the underlying matter as well as several other matters needed to be reviewed and assigned to other attorneys within the firm. This has not given

the undersigned counsel sufficient time to complete the complex task of a Supreme Court answering brief.

An additional 30 day extension is sought. This request is presented in good faith, and not for purposes of delay or any other improper reason.

Respectfully submitted this 9th day of August, 2021.

HUTCHISON & STEFFEN, PLLC

/s/ Daniel H. Stewart

Daniel H. Stewart (11287)
10080 West Alta Drive, Suite 200
Las Vegas, NV 89145
Telephone: 702/385-2500
dstewart@hutchlegal.com

*Attorney for Respondent Breckenridge
Property Fund 2016, LLC*

CERTIFICATE OF SERVICE

I certify that I am an employee of HUTCHISON & STEFFEN, LLC and that on this date **RESPONDENT BRECKENRIDGE PROPERTY FUND 2016, LLC'S MOTION FOR AN EXTENSION OF TIME TO FILE ANSWERING BRIEF (FIRST 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:

Tiffany & Bosco, P.A.
Ace C. Van Patten
Kevin S. Soderstrom
10100 W. Charleston Blvd, Suite 220
Las Vegas, NV 89135

And Via U.S. Mail

Leo Kramer
Audrey Kramer
1740 Autumn Glen Street,
Fernley, Nevada 89408

DATED this 9th day of August, 2021.

/s/ Kaylee Conradi

An employee of Hutchison & Steffen, PLLC