

**In The Supreme Court of the State of Nevada**

NATIONSBUILDERS INSURANCE  
SERVICES INC., a foreign  
corporation; NBIS CONSTRUCTION  
& TRANSPORT INSURANCE  
SERVICES, INC., a foreign  
corporation;

Petitioners,

vs.

THE EIGHTH JUDICIAL DISTRICT  
COURT of the State of Nevada, in  
and for the County of Clark; and THE  
HONORABLE MARK R. DENTON,  
District Judge;

Respondents.

DIANE SANCHEZ, an individual;

Real Party in Interest.

Supreme Court Case No. 84227  
District Court Case No. A-19-  
805351-C Electronically Filed  
Mar 28 2022 06:03 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**REAL PARTY IN INTEREST DIANE SANCHEZ'S MOTION FOR  
EXTENSION OF TIME TO FILE ANSWER TO PETITION FOR  
WRIT OF MANDAMUS, OR ALTERNATIVELY, PROHIBITION**

Real Party in Interest Diane Sanchez ("Sanchez"), by and through her  
counsel of record, Dennis M. Prince and Kevin T. Strong of PRINCE LAW  
GROUP, respectfully moves to extend the time to file her Answer to  
Petitioners NationsBuilders Insurance Services, Inc. and NBIS  
Construction & Transport Insurance Services, Inc.'s Petition for Writ of

Mandamus, or alternatively, Prohibition, by seven (7) days, up to and including, Monday, April 4, 2022, pursuant to NRAP 31(b)(3). This is Sanchez's second request for extension of time as she received a fourteen (14) day telephonic extension pursuant to NRAP 31(b)(1). Sanchez's Answer is currently due on March 28, 2022. Sanchez's Answer was originally due on March 14, 2022.

Sanchez respectfully requests this brief extension of time for a multitude of reasons. Sanchez's undersigned counsel of record, Mr. Prince, devoted substantial time and resources over the last couple of weeks to prepare for trial in the matter of *Duross v. Arias*, Case No. A-19-792987. The trial was scheduled to begin on March 28, 2022, but over the weekend, the parties agreed to submit the case to binding arbitration.

Sanchez's other undersigned counsel of record, Mr. Strong, spent significant time away from the office over the last week to tend to unforeseen issues arising from a construction project taking place at his residence. Due to these completely unexpected circumstances, Sanchez respectfully requests one additional week to finalize her Answer.

As the Court is aware, this matter involves a substantial factual record because of the underlying personal injury litigation, which is currently pending on appeal (NVSC Case No. 81983). Sanchez's requested

extension of time will ensure this Court has a complete understanding of the factual record in the underlying personal injury litigation that is directly relevant to the issues Petitioners raise in the writ petition. This brief extension of time will also allow Sanchez to finalize her responsive arguments to ensure they completely address all of Petitioners' points set forth in support of their requested relief. In turn, this Court will receive a full and fair opportunity to comprehensively evaluate the merits of the parties' respective legal positions.

Based on the foregoing, Sanchez respectfully requests this Court to grant her request for a seven (7) day extension of time, up to and including April 4, 2022, to submit her Answer to Petitioners' Writ Petition. This request is made in good faith and not for the purpose of undue delay in the resolution of this matter.

DATED this 28th day of March, 2022.

Respectfully Submitted,

/s/ Kevin T. Strong

DENNIS M. PRINCE  
Nevada Bar No. 5092  
KEVIN T. STRONG  
Nevada Bar No. 12107  
**PRINCE LAW GROUP**  
10801 W. Charleston Boulevard  
Suite 560  
Las Vegas, Nevada 89135  
Attorneys for Respondent  
*Diane Sanchez*

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that this document was filed electronically with the Supreme Court of Nevada on the 28th day of March, 2022. Electronic service of the foregoing document entitled **REAL PARTY IN INTEREST DIANE SANCHEZ'S MOTION FOR EXTENSION OF TIME TO FILE ANSWER TO PETITIONERS PETITION FOR WRIT OF MANDAMUS, OR ALTERNATIVELY, PROHIBITION** shall be made in accordance with the Master Service List and the Court's eFlex electronic filing system to the following:

Joseph P. Garin  
Megan H. Thongkham  
LIPSON NEILSON P.C.  
9900 Covington Cross Drive  
Suite 120  
Las Vegas, Nevada 89144  
Attorneys for Petitioners  
*NationsBuilders Insurance Services, Inc. and  
NBIS Construction & Transport Insurance  
Services, Inc.*

/s/ Kevin T. Strong  
An Employee of PRINCE LAW GROUP