

IN THE SUPREME COURT OF THE STATE OF NEVADA

Electronically Filed
Aug 18 2022 05:51 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

SARAH JANEEN ROSE,

Appellant,

S.C. No.: 84295
D.C. No.: D-17-547250-D

vs.

DAVID JOHN ROSE,

Respondent.

MOTION TO EXTEND TIME
(First Request by Motion/Telephonic Request Granted)

Attorney for Appellant:

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Attorney for Respondent

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NRAP 26.1 DISCLOSURE STATEMENT

The undersigned counsel certifies that the following are persons and entities as described in NRAP 26.1(a) and must be disclosed. These representations are made in order that the Judges of this Court may evaluate possible disqualification or recusal. In the course of these proceedings leading up to this appeal, Respondent has been represented by the following attorneys:

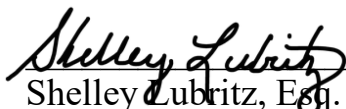
- a. Shelley Lubritz, Esq. LAW OFFICE OF SHELLEY LUBRITZ, PLLC, appellate attorney for Respondent/Plaintiff.
- b. Regina M. McConnell, Esq., McCONNELL, LTD., former attorney for Respondent/Plaintiff.

There are no corporations, entities, or publicly held companies that own 10% or more of Respondent's stock or business interests.

Dated this 18th day of August, 2022.

Respectfully submitted:

LAW OFFICE OF SHELLEY LUBRITZ, PLLC


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MOTION TO EXTEND TIME
(First Request by Motion/Telephonic Request Granted)

Respondent hereby moves for a 31-day extension of time to file his Answering Brief, which is due August 26, 2022. The Brief was originally due July 12, 2022. A 14-day telephonic extension was granted. No request for an extension of time has been denied or denied, in part, by this Court.

A Joint Appendix was filed on July 13, 2022 containing 1921 pages within ten (10) volumes. The record in this case is large and involves complex issues, more specifically, whether irrevocable survivor benefits to a PERS pension are community property subject to division. This issue has long been brought before the Court, most recently in its unpublished opinion, *Holquin v. Holquin*, 491 P.3d 735 (Table)(Nev. 2021), and substantial research is required to submit a thoughtful and thorough Brief. Respondent's attorney firmly believes she will be able to file the Answering Brief within the extended time.

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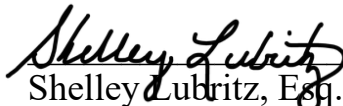
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Therefore, Respondent respectfully requests an extension of time within which to file his Answering Brief through and including, September 26, 2022. This motion is made in good faith and without the intent to delay the appeal unnecessarily.

Dated this 18th day of August, 2022.

Respectfully submitted:

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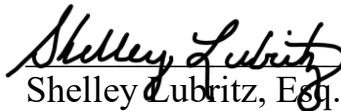
CERTIFICATE OF SERVICE

I certify on the 18th day of August, 2022, pursuant to N.E.F.R. 7, I caused the **MOTION TO EXTEND TIME** to be filed electronically with the Clerk of the Nevada Supreme Court. Pursuant to N.E.F.R. 9, notice of an electronically filed document by the Court “shall be considered as valid and effective service of the document” on the below listed persons who are registered users.

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ATTORNEY FOR APPELLANT

Dated this 18th day of August, 2022.

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