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Elizabeth A. Brown  
Clerk of Supreme Court

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

LN MANAGEMENT LLC SERIES 3111  
BEL AIR 24G,

Appellant

v.  
BANK OFAMERICA, N.A.; DITECH  
FINANCIAL LLC,

Respondent.

Supreme Court Case No. 82534

**APPELLANT’S MOTION TO EXTEND TIME TO FILE APPELLANT’S  
OPENING BRIEF (SECOND REQUEST)**

Comes now LN Management LLC Series 3111 BEL AIR 24G,  
 (“Appellant”), by and through its counsel of record, Kerry P. Faughnan, Esq.,  
 pursuant to NRAP 31(b), hereby requests that the Court extend its time to file its  
 Opening Brief approximately 30 days, from a current due date of Monday, August  
 16, 2021.

Appellant states and declares as good cause:



- Recent decisions make this case is ripe for settlement, and Appellant's principals are in the process of requesting cure and payoff information from Respondent to resolve the case.
- Counsel for the Appellant has recently had some personal family emergencies that have hindered his ability to address the Opening Brief more adequately.
- One prior 30 day extension of the opening brief was granted by the court after stipulation of the parties.
- This extension is not made to unduly delay this matter, but to attempt in good faith to resolve this appeal in the same fashion that has been successfully occurring with a number of other cases of the Appellant's beneficiaries, which have similar factual situations.
- For the foregoing reasons, Appellant requests an additional approximately 30 days, to Wednesday, September 16, 2021 to file Appellant's Opening Brief, if settlement is not concluded.

August 16, 2021.

Respectfully submitted,

/s/ Kerry P. Faughnan  
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## **CERTIFICATE OF SERVICE**

I certify that on August 16, 2021, I served a copy of the foregoing pleading upon all counsel of record by allowing the Court's ECF system to serve same upon:

Natalie Winslow, Esq.  
AKERMAN LLP  
1635 Village Center Circle Ste. 200  
Las Vegas, Nevada 89134

Attorney for Respondent

DATED August 16, 2021.

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