

IN THE SUPREME COURT OF THE STATE OF NEVADA

ESTATE OF REBECCA
POWELL, through Brian Powell as
Special Administrator; DARCI
CREECY, individually; TARYN
CREECY, individually; ISAIAH
KHOSROF, individually; LLOYD
CREECY, individually,

Appellants,

vs.

VALLEY HEALTH SYSTEM,
LLC (doing business as
“Centennial Hills Hospital Medical
Center”),

Respondent.

Appeal No. 84861

Electronically Filed
Oct 31 2022 01:21 PM
Elizabeth A. Brown
Clerk of Supreme Court

**JOINT MOTION TO PERMIT APPELLANTS ADDITIONAL
TIME TO FILE AN OPENING BRIEF**

Pursuant to Nevada Rules of Appellate Procedure 26(b), 27 and 31,
Appellants and Respondent Valley Health System, LLC, by and through
their respective counsel, respectfully request that the Court grant this
motion to permit Appellants sixty (60) additional days (or until January
9, 2023) to file an Opening Brief in this case. Currently, Appellants’

Opening Brief is due on November 9, 2022. In support of this motion, the parties rely upon the following:

1. Counsel for Appellants has communicated to counsel for Respondent that he is required to travel out of state due to medical circumstances prior to the current filing deadline of Appellants' Opening Brief. Because of these circumstances and the need to attend to serious health considerations, both before and after the current deadline, counsel for Appellants will not be able to meet the present deadline and will need additional time to file the Opening Brief.

2. The parties have communicated regarding this motion and the circumstances necessitating this additional request for more time to file an Opening Brief. The parties agree that permitting counsel for Appellants an additional 60-days, or until January 9, 2023, to file the Opening Brief is reasonable and warranted under the extraordinary circumstances set forth herein involving the health of Appellants' counsel. As reflected in the Court's record, counsel for Appellants has

only requested one prior extension of 14-days. This is Appellants' counsel's second request for an extension.

Based upon the foregoing, the parties jointly request (*see* Exhibit A) that the Court grant this motion and permit Appellants to file their Opening Brief on or before January 9, 2023.

Respectfully submitted,

/s/ *Adam Garth*

/s/ *Paul S. Padda*

S. Brent Vogel, Esq.
Adam Garth, Esq.
Attorneys for Respondent

Paul S. Padda, Esq.
Attorney for Appellants

Dated: October 31, 2022

Dated: October 31, 2022

CERTIFICATE OF SERVICE

Pursuant to the Nevada Rules of Appellate Procedure, I hereby certify that on this day, October 31, 2022, the foregoing document entitled **JOINT MOTION TO PERMIT APPELLANTS ADDITIONAL TIME TO FILE AN ANSWERING BRIEF** was filed with the Supreme Court of Nevada through its electronic filing system. Service of the foregoing document shall be made in accordance with the Master Service List upon all registered parties and/or participants and their counsel.

/s/ Shelbi Schram

Shelbi Schram, Paralegal

EXHIBIT A

EXHIBIT A

Paul Padda

From: Paul Padda
Sent: Monday, October 31, 2022 8:22 AM
To: Garth, Adam; Vogel, Brent
Subject: Re: Motion for Extension - Powell et. al. v. Valley Health

Ok. Apologies to Brent for that typo.

Get [Outlook for iOS](#)

From: Garth, Adam <Adam.Garth@lewisbrisbois.com>
Sent: Monday, October 31, 2022 8:03:07 AM
To: Paul Padda <psp@paulpaddalaw.com>; Vogel, Brent <Brent.Vogel@lewisbrisbois.com>
Subject: RE: Motion for Extension - Powell et. al. v. Valley Health

Other than changing Brent's first initial from J to S, you may use my e-signature.



Adam Garth
Partner
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From: Paul Padda <psp@paulpaddalaw.com>
Sent: Friday, October 28, 2022 3:46 PM
To: Vogel, Brent <Brent.Vogel@lewisbrisbois.com>; Garth, Adam <Adam.Garth@lewisbrisbois.com>
Subject: [EXT] Re: Motion for Extension - Powell et. al. v. Valley Health

Counsel, please review and let me know if I have your consent to file.

Paul S. Padda, Esq.

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