

IN THE SUPREME COURT OF THE STATE OF NEVADA

ESTATE OF REBECCA POWELL,  
THROUGH BRIAN POWELL, AS  
SPECIAL ADMINISTRATOR; DARCI  
CREECY, INDIVIDUALLY AND AS  
HEIR; TARYN CREECY,  
INDIVIDUALLY AND AS HEIR;  
ISAIAH KHOSROF, INDIVIDUALLY  
AND AS HEIR; AND LLOYD  
CREECY, INDIVIDUALLY,

Appellants,

vs.

VALLEY HEALTH SYSTEM, LLC,  
D/B/A CENTENNIAL HILLS  
HOSPITAL MEDICAL CENTER, A  
FOREIGN LIMITED LIABILITY  
COMPANY,

Respondent.

Supreme Court No. 84861  
District Court Case No. A-19-788787-C

Electronically Filed  
Dec 12 2022 03:05 PM  
Elizabeth A. Brown  
Clerk of Supreme Court

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**RESPONDENT'S OPPOSITION TO APPELLANTS' MOTION FOR  
EXTENSION OF TIME TO RESPOND TO MOTION TO REQUIRE  
POSTING OF OR INCREASING AMOUNT OF SUPERSEDEAS BOND BY  
APPELLANTS**

---

S. BRENT VOGEL  
Nevada Bar No. 6858  
ADAM GARTH  
Nevada Bar No. 15045  
Lewis Brisbois Bisgaard & Smith LLP  
6385 South Rainbow Boulevard, Suite 600  
Las Vegas, Nevada 89118  
Telephone: 702-893-3383  
Facsimile: 702-893-3789  
*Attorneys for Respondent*

## MEMORANDUM OF POINTS AND AUTHORITIES

### I. INTRODUCTION

Appellants (“Plaintiffs”) are engaged in a campaign of delay by misleading the District Court, this Court, and VHS’s counsel regarding another excuse for more extensions of time.

Plaintiffs’ appellate brief in this case was first due on October 25, 2022 after an unsuccessful settlement conference (**Exhibit “A”**). As evidenced by the email exchange, Plaintiffs requested a 60 day extension (until December 26, 2022), and VHS agreed to provide Plaintiffs a 30 day extension (**Exhibit “A”**). The day after requesting their extension, Plaintiffs’ counsel emailed our office at 2:21 p.m. the day before a hearing was ordered by the District Court for a judgment debtors’ examination of Plaintiffs to advise us that none of Plaintiffs would be appearing in defiance of the District Court’s order (**Exhibit “B”**).<sup>1</sup> One hour later, Plaintiffs’ counsel advised that the requested 60-day extension (which VHS consented to give 30 days) was unnecessary since Plaintiffs’ counsel obtained an automatic 14-day extension from this Court (**Exhibit “C”**).

After obtaining their 14-day extension to file their brief, on October 26, 2022,

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<sup>1</sup> Plaintiffs further failed to comply with the District Court’s order to supply required discovery 2 weeks in advance of the September 28, 2022 judgment debtors’ examination, but the order to do so as well as any appearances for the examination were eventually stayed by the District Court pending the outcome of the instant appeal.

Plaintiffs sought another 60-day extension (**Exhibit “D”**), this time claiming a medical excuse, out of town medical appointments, and an extended convalescence as justification for this request. After VHS agreed to the additional 60-day extension (now 74 days from original due date), Plaintiffs obtained VHS’s consent to file a joint motion for said extension, referring to the medical excuse to obtain VHS’s consent (**Exhibit “E”**), which motion was granted and Plaintiffs have until January 9, 2022 to file their brief.

Promptly after obtaining the transcripts of the hearings pertaining to the Plaintiffs’ late filed motion to stay enforcement proceedings, and after learning for the first time that a bond for \$500 had been filed by Plaintiffs (an amount far less than the judgment for \$122,000+ accrued interest already on file), VHS requested that the District Court raise the bond to reflect the amount of the judgment, which request was denied and is the subject of the motion underlying Plaintiffs’ request to extend time to oppose. As is evident in VHS’s motion now pending before this Court, Plaintiffs asserted that no bond was even necessary in this case (**Appendix to VHS’s pending motion, Vol. I, pp. 119-120**), and Plaintiffs argued the inapplicability of the factors outlined in *Nelson v. Heer*, 121 Nev 832, 122 P.3d 1252 (2005), the very factors which comprise VHS’s pending motion to increase the supersedeas bond.

Despite the claims of medical issues and extended convalescence during the

very period for which the extension was sought, Plaintiffs request an additional month's extension to oppose VHS's pending motion. In Plaintiffs' request, the excuse proffered by Mr. Padda is that he has been on trial since November 28, 2022 (curiously coinciding with the extended convalescence period the subject of which got him multiple extensions to file his appellants' brief in this matter), combined with the misleading statement that the pending motion is over 500 pages. While technically true that the motion and exhibits exceeds 500 pages, the motion itself is only 10 pages, and speaks to the very issues addressed by Plaintiffs themselves in the Court below, only this time, with accurate citations to the case law (unlike Plaintiffs did in the Court below).

At every turn, Plaintiffs have sought to delay the day of reckoning here. They misled the Court below in opposition to VHS's summary judgment motion, and it was this Court which prevented that from going further, having overruled the District Court and granted summary judgment. Thereafter, they failed to timely object to the memorandum of costs in the Court below, but nevertheless requested a "do over" which was denied. Plaintiffs thereafter filed what will be demonstrated to be a baseless appeal (which brief has yet to be filed). Plaintiffs' counsel sought multiple extensions of time to file Plaintiffs' brief, claiming a medical excuse but now it is clear that he was going to trial, presenting this medical excuse to our firm and this Court to obtain his extension. Plaintiffs' counsel and his clients disobeyed District

Court orders to produce documents and appear for a judgment debtors' examination, and the day before the hearing, indicated they would not appear in defiance of that order, and filed an after business hours motion to stay enforcement of any collection proceedings. Now, after business hours on the day their opposition to the pending motion is due, Plaintiffs request an additional month to oppose a motion which they supposedly brief, this time claiming that there are so many materials to review in order to oppose. Instead of actually doing the work, they wasted everyone's time requesting extension after extension, to delay the case for VHS. Plaintiffs' motion to extend should not be granted. There are no new issues with which Plaintiffs' counsel is unfamiliar. The fact that Plaintiffs' counsel "snuck" in his motion to extend after business hours of the due date for opposition, without even so much as requesting a stipulated extension is further demonstration of the disingenuity of this attorney. He clearly knew that his favor well was exhausted, and rather than asking for a stipulation, hopes this Court will have more pity on him and grant the extension. This nonsense cannot go on any longer.

## **II. LEGAL ARGUMENT**

All motions for extension of time must establish good cause for the requested extension and must be served on all parties. See NRAP 26(b)(1)(A); NRAP 27(a)(2). As the evidence submitted herewith demonstrates, the question of the Plaintiffs' counsel's candor with his adversary as well as with this Court is certainly

concerning. The evidence demonstrates that multiple extensions of time to file Plaintiffs' underlying brief in this matter were obtained on the premise that Mr. Padda was experiencing serious medical issues requiring out of state treatment and extended convalescence. In the very middle of that supposed convalescence is a trial for which he now claims is his excuse for requesting this extension. Moreover, the issues raised in VHS's pending motion were already supposedly addressed by Mr. Padda in the Court below, only to have him attempt to mislead this Court into believing that the motion at issue raises some obscure legal issue (which it does not) for which a month's extension is required to oppose. Plaintiffs' counsel squandered his extension requests and instead of substantively dealing with the legal issues involved in responding to this motion, he chose instead to ask this Court for another judicial lifeline at VHS's expense. The questionable conduct in obtaining and requesting extensions by Plaintiffs' counsel throughout this litigation should not be countenanced any further, his request should be denied, and VHS's pending motion be granted without opposition.

### III. CONCLUSION

Given the evidence submitted herewith, Plaintiffs have met the good cause burden necessary to obtain the relief they seek. As such, Plaintiffs' motion should be denied in its entirety and VHS's pending motion be granted without opposition.

DATED this 12<sup>th</sup> day of December 2022.

LEWIS BRISBOIS BISGAARD &  
SMITH LLP

By /s/ Adam Garth

---

S. BRENT VOGEL

Nevada Bar No. 006858

ADAM GARTH

Nevada Bar No. 15045

6385 S. Rainbow Boulevard, Suite 600

Las Vegas, Nevada 89118

Tel. 702.893.3383

*Attorneys for Respondent Valley Health  
System, LLC*

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 12<sup>th</sup> day of May, 2022, a true and correct copy of **RESPONDENT'S OPPOSITION TO APPELLANTS' MOTION FOR EXTENSION OF TIME TO RESPOND TO MOTION TO REQUIRE POSTING OF OR INCREASING AMOUNT OF SUPERSEDEAS BOND BY APPELLANTS** was served upon the following parties by electronic service through this Court's electronic service system and also by placing a true and correct copy thereof in the United States Mail in Las Vegas, Nevada with first class postage fully prepaid:.

Paul S. Padda, Esq.  
PAUL PADDA LAW, PLLC  
4560 S. Decatur Blvd., Suite 300  
Las Vegas, NV 89103  
Tel: 702.366.1888  
Fax: 702.366.1940  
[psp@paulpaddalaw.com](mailto:psp@paulpaddalaw.com)  
*Attorneys for Plaintiffs*

By

/s/ Heidi Brown

An Employee of  
LEWIS BRISBOIS BISGAARD &  
SMITH LLP



# EXHIBIT A

**From:** [Garth, Adam](#)  
**To:** [Srilata Shah](#)  
**Cc:** [Paul Padda](#); [Shelbi Schram](#); [Vogel, Brent](#); [Brown, Heidi](#); [San Juan, Maria](#); [DeSario, Kimberly](#)  
**Subject:** RE: Re: Estate of Rebecca Powell - Request for extension to file appellate brief  
**Date:** Tuesday, September 27, 2022 9:10:40 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

---

We will agree to a 30 day extension. If that works for you, please prepare stipulation for our review prior to submission. Thanks.

Adam Garth

---

**From:** Srilata Shah <sri@paulpaddalaw.com>  
**Sent:** Monday, September 26, 2022 3:10 PM  
**To:** Garth, Adam <Adam.Garth@lewisbrisbois.com>  
**Cc:** Paul Padda <psp@paulpaddalaw.com>; Shelbi Schram <shelbi@paulpaddalaw.com>; Vogel, Brent <Brent.Vogel@lewisbrisbois.com>  
**Subject:** [EXT] Re: Estate of Rebecca Powell - Request for extension to file appellate brief

Dear Mr. Garth:

Our appellate brief is due on October 25, 2022. We are requesting a 60-day extension through December 26, 2022, to file our brief. We will forward a Stipulation Extending the Deadline if you are amenable to granting us the extension. Thank you. Sri

**Srilata Shah, Esq.**

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(702) 366-1888  
[sri@paulpaddalaw.com](mailto:sri@paulpaddalaw.com)  
[paulpaddalaw.com](http://paulpaddalaw.com)



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**Mailing Address For All Offices:**

4030 South Jones Blvd., Unit 30370  
Las Vegas, Nevada 89173



**PAUL PADDA LAW**

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# EXHIBIT B

**From:** [Paul Padda](#)  
**To:** [Garth, Adam](#); [Srilata Shah](#); [Vogel, Brent](#)  
**Cc:** [Lani Esteban-Trinidad](#)  
**Subject:** [EXT] Re: Estate of Rebecca Powell  
**Date:** Tuesday, September 27, 2022 2:21:00 PM  
**Attachments:** [image001.png](#)

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Dear Messrs. Vogel and Garth,

I am writing to advise that none of the respondents in your Judgment Debtor proceeding will be able to appear tomorrow. As you know, they have very limited financial means and are unable to travel to Las Vegas. In fact, to my knowledge, they haven't stepped foot in Nevada since the passing of Rebecca Powell. I am providing this in advance to avoid any inconvenience. I will also be seeking relief from the Court regarding the same.

Regards,  
Paul Padda

**Paul S. Padda, Esq.**

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# EXHIBIT C

**From:** [Srilata Shah](#)  
**To:** [Garth, Adam](#)  
**Cc:** [Paul Padda](#); [Shelbi Schram](#); [Vogel, Brent](#); [Brown, Heidi](#); [San Juan, Maria](#); [DeSario, Kimberly](#)  
**Subject:** [EXT] RE: Re: Estate of Rebecca Powell - Request for extension to file appellate brief  
**Date:** Tuesday, September 27, 2022 3:10:47 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

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Dear Mr. Garth:

Thank you for your prompt response to my email and agreeing to a 30-day extension. Paul reached out to the Court and was granted a 14-day extension. We should be able to file our brief withing the time granted by the Court. Thank you again for your professional courtesy. Sri

**Srilata Shah, Esq.**

PAUL PADDA LAW, PLLC  
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[sri@paulpaddalaw.com](mailto:sri@paulpaddalaw.com)  
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---

**From:** Garth, Adam <Adam.Garth@lewisbrisbois.com>

**Sent:** Tuesday, September 27, 2022 9:11 AM

**To:** Srilata Shah <sri@paulpaddalaw.com>

**Cc:** Paul Padda <psp@paulpaddalaw.com>; Shelbi Schram <shelbi@paulpaddalaw.com>; Vogel, Brent <Brent.Vogel@lewisbrisbois.com>; Brown, Heidi <Heidi.Brown@lewisbrisbois.com>; San Juan, Maria <Maria.SanJuan@lewisbrisbois.com>; DeSario, Kimberly <Kimberly.DeSario@lewisbrisbois.com>

**Subject:** RE: Re: Estate of Rebecca Powell - Request for extension to file appellate brief

We will agree to a 30 day extension. If that works for you, please prepare stipulation for our review prior to submission.  
Thanks.



Adam Garth



**Adam Garth**  
**Partner**  
[Adam.Garth@lewisbrisbois.com](mailto:Adam.Garth@lewisbrisbois.com)

**T: 702.693.4335 F: 702.366.9563**

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**From:** Srilata Shah <[sri@paulpaddalaw.com](mailto:sri@paulpaddalaw.com)>

**Sent:** Monday, September 26, 2022 3:10 PM

**To:** Garth, Adam <[Adam.Garth@lewisbrisbois.com](mailto:Adam.Garth@lewisbrisbois.com)>

**Cc:** Paul Padda <[psp@paulpaddalaw.com](mailto:psp@paulpaddalaw.com)>; Shelbi Schram <[shelbi@paulpaddalaw.com](mailto:shelbi@paulpaddalaw.com)>; Vogel, Brent <[Brent.Vogel@lewisbrisbois.com](mailto:Brent.Vogel@lewisbrisbois.com)>

**Subject:** [EXT] Re: Estate of Rebecca Powell - Request for extension to file appellate brief

Dear Mr. Garth:

Our appellate brief is due on October 25, 2022. We are requesting a 60-day extension through December 26, 2022, to file our brief. We will forward a Stipulation Extending the Deadline if you are amenable to granting us the extension. Thank you. Sri

**Srilata Shah, Esq.**

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# EXHIBIT D

**From:** [Paul Padda](#)  
**To:** [Garth, Adam](#); [Vogel, Brent](#)  
**Cc:** [Brown, Heidi](#); [DeSario, Kimberly](#)  
**Subject:** [EXT] RE: Re: Powell v. UHS -- NV Supreme Court  
**Date:** Wednesday, October 26, 2022 3:34:48 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Thank you. Yes, I will extend reciprocal courtesy.

**Paul S. Padda, Esq.**

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---

**From:** Garth, Adam <Adam.Garth@lewisbrisbois.com>  
**Sent:** Wednesday, October 26, 2022 3:33 PM  
**To:** Paul Padda <psp@paulpaddalaw.com>; Vogel, Brent <Brent.Vogel@lewisbrisbois.com>  
**Cc:** Brown, Heidi <Heidi.Brown@lewisbrisbois.com>; DeSario, Kimberly <Kimberly.DeSario@lewisbrisbois.com>  
**Subject:** RE: Re: Powell v. UHS -- NV Supreme Court

As a professional courtesy, we will agree to the 60 day extension with the proviso that given the timing of your brief and our current trial schedule, we may need an extension of time on our respondent's brief and if we require the same courtesy, we want your assurance that we will get the same in return.

Adam Garth

**Adam Garth**  
**Partner**

[Adam.Garth@lewisbrisbois.com](mailto:Adam.Garth@lewisbrisbois.com)



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**From:** Paul Padda <[psp@paulpaddalaw.com](mailto:psp@paulpaddalaw.com)>

**Sent:** Wednesday, October 26, 2022 1:54 PM

**To:** Garth, Adam <[Adam.Garth@lewisbrisbois.com](mailto:Adam.Garth@lewisbrisbois.com)>; Vogel, Brent <[Brent.Vogel@lewisbrisbois.com](mailto:Brent.Vogel@lewisbrisbois.com)>

**Cc:** Brown, Heidi <[Heidi.Brown@lewisbrisbois.com](mailto:Heidi.Brown@lewisbrisbois.com)>; DeSario, Kimberly <[Kimberly.DeSario@lewisbrisbois.com](mailto:Kimberly.DeSario@lewisbrisbois.com)>

**Subject:** [EXT] RE: Re: Powell v. UHS -- NV Supreme Court

Thank you. I requested 60-days taking into account my personal circumstances which involve medical issues. I appreciate the agreement to 30-days but that will not be sufficient given my circumstances. I requested 60-days for a reason. As for the previous 14-day request, that was requested at that time with the anticipation I would be able to meet the deadline. Unfortunately, things have arisen that require I attend to my health. Please reconsider and let me know. Thanks.

**Paul S. Padda, Esq.**

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---

**From:** Garth, Adam <[Adam.Garth@lewisbrisbois.com](mailto:Adam.Garth@lewisbrisbois.com)>  
**Sent:** Wednesday, October 26, 2022 1:48 PM  
**To:** Paul Padda <[psp@paulpaddalaw.com](mailto:psp@paulpaddalaw.com)>; Vogel, Brent <[Brent.Vogel@lewisbrisbois.com](mailto:Brent.Vogel@lewisbrisbois.com)>  
**Cc:** Brown, Heidi <[Heidi.Brown@lewisbrisbois.com](mailto:Heidi.Brown@lewisbrisbois.com)>; DeSario, Kimberly <[Kimberly.DeSario@lewisbrisbois.com](mailto:Kimberly.DeSario@lewisbrisbois.com)>  
**Subject:** RE: Re: Powell v. UHS -- NV Supreme Court

We will agree to a 30 day extension if you would like to prepare the stipulation to extend on that basis.

As we understand it, your associate requested a 60 day extension on 9/26 to go until 12/26. At that time, we agreed to a 30 day extension which your firm chose not to pursue and instead sought the 14 day extension from the court. You have already had 3 ½ months to file your brief from the time the schedule was reinstated and months before that with time wasted for settlement conferences.

While we are understanding of your medical issues, this matter has been dragged out for years and we are consistently asked to extend professional courtesies to your office while our time has not been respected.

Let us know if the 30 days is acceptable.



**Adam Garth**  
**Partner**  
[Adam.Garth@lewisbrisbois.com](mailto:Adam.Garth@lewisbrisbois.com)

**T: 702.693.4335 F: 702.366.9563**

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**From:** Paul Padda <[psp@paulpaddalaw.com](mailto:psp@paulpaddalaw.com)>  
**Sent:** Wednesday, October 26, 2022 1:36 PM  
**To:** Vogel, Brent <[Brent.Vogel@lewisbrisbois.com](mailto:Brent.Vogel@lewisbrisbois.com)>; Garth, Adam <[Adam.Garth@lewisbrisbois.com](mailto:Adam.Garth@lewisbrisbois.com)>  
**Subject:** [EXT] Re: Powell v. UHS -- NV Supreme Court

Counsel, I have a medical procedure I will need to get and will be out of town prior to the Opening Brief being due. Please advise if you are willing to agree to a 60-day extension of time for Appellants to file an Opening Brief. Currently, our brief is due on November 9, 2022. Please let me know your position by 3 pm tomorrow. Thanks.

**Paul S. Padda, Esq.**

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# EXHIBIT E



**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**  
[Adam.Garth@lewisbrisbois.com](mailto:Adam.Garth@lewisbrisbois.com)  
**T: 702.693.4335 F: 702.366.9563**

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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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