

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.

Electronically Filed
Jan 09 2023 02:40 PM
Elizabeth A. Brown
Clerk of Supreme Court
Appeal No. 84861

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

Pursuant to Nevada Rules of Appellate Procedure 26(b), 27 and 31,
Appellants, by and through their undersigned counsel, respectfully
request that the Court grant this motion to permit Appellants an
additional fifteen (15) business days (or until January 30, 2023) to file an

. . .

Opening Brief and Appendix in this case. Currently, Appellants' Opening Brief is due on January 9, 2023. In support of this motion, supported by good cause and extraordinary circumstances, the Appellants' rely upon the following:

1. This is Appellants' third request for extension of time, the Court having previously granted Appellants' a total of approximately 74-business days to file an Opening Brief.

2. This request is necessitated by undersigned counsel's ongoing medical issues. During a portion of the past two weeks, undersigned counsel was not able to fully work in front of a computer for extended periods of time due to an ongoing medical issue for which he has been receiving treatment and pain management.

3. While undersigned counsel anticipated making significant progress on the Opening Brief and meeting the current deadline (notwithstanding the separate medical issue detailed in the preceding paragraph) he also became ill recently with what he believes may be the

result of exposure to COVID. Specifically, at least 3 staff members of undersigned counsel's firm have been out of the office recently due to illness with two staff members reporting positive COVID infection.

Accordingly, at the time of this filing, undersigned counsel remains out of the office due to illness and flu like symptoms and anticipates getting a COVID test today to determine whether and when he can return to the office.

4. In light of the foregoing, undersigned counsel for Appellants has simply not been able to timely complete the Opening Brief for the reasons cited herein. Unfortunately, due to the health issues mentioned herein, he has been required to address these issues before he can devote the time necessary to his work responsibilities. Appellants and undersigned counsel respectfully request that the Court grant this request for a short extension of 15-business days to file an Opening Brief and Appendix. Absent some unforeseen issue, undersigned counsel does not anticipate requesting any additional extensions of time and apologizes to

the Court for any inconvenience occasioned by this request necessitated by health reasons.

Respectfully submitted,

/s/ *Paul S. Padda*

Paul S. Padda, Esq.

Dated: January 9, 2023

CERTIFICATE OF SERVICE

Pursuant to the Nevada Rules of Appellate Procedure, I hereby certify that on this day, January 9, 2023, the foregoing document entitled **MOTION TO PERMIT APPELLANTS ADDITIONAL TIME TO FILE AN OPENING 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
PAUL PADDALAW