

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.

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Elizabeth A. Brown
Clerk of Supreme Court
Appeal No. 84861

**APPELLANTS’ REPLY TO RESPONDENT’S
OPPOSITION TO EXTENSION OF TIME
TO FILE OPENING BRIEF**

Pursuant to Nevada Rule of Appellate Procedure 27(a)(4),
Appellants submit this reply to Respondent’s opposition to Appellants’
motion for a 15-day extension to file an Opening Brief.

Getting right to the point, the opposition is frivolous and fails to address the actual basis for the motion– undersigned counsel’s health issues. As noted in the motion, undersigned became ill and continues to deal with health issues and, upon that basis, sought a short 15-business day extension of time to file Appellants’ Opening Brief. Instead, of addressing that issue, counsel for Respondent dedicates several pages to engaging in unprofessional personal attacks and offering irrelevant opinions about topics of no consequence to the issue before the Court. Since counsel for Respondent has failed to address the *actual basis* for the motion, instead decrying what he characterizes as attempts to engage the Court’s sympathy, the Court should treat the motion as conceded and grant it. As requested in the motion, Appellants’ should be permitted to file their Opening Brief 9-business days from today. Despite ongoing health issues, undersigned counsel can assure the Court that if the motion is granted, he will in fact file the Opening Brief on January 30, 2023.

For the reasons set forth in the motion and this reply, undersigned counsel respectfully requests that the Court grant the motion for a 15-business extension of time to file an Opening Brief and Appendix.

Respectfully submitted,

/s/ Paul S. Padda

Paul S. Padda, Esq.

Dated: January 17, 2023

CERTIFICATE OF SERVICE

Pursuant to the Nevada Rules of Appellate Procedure, I hereby certify that on this day, January 17, 2023, the foregoing document entitled **APPELLANTS' REPLY TO RESPONDENT'S OPPOSITION TO EXTENSION OF TIME TO FILE 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 PADDA LAW