Case No. 85525

In the Supreme Court of Nevada

UNITED HEALTHCARE INSURANCE COMPANY; UNITED Jan 18 2023 04:41 PM HEALTH CARE SERVICES, INC.; UMR, INC.; SIERRA HEALTH AND LIFE INSURANCE COMPANY, INC.; and HEALTH PLAN OF NEVADA, INC.,

Electronically Filed Elizabeth A. Brown Clerk of Supreme Court

Appellants,

vs.

FREMONT EMERGENCY SERVICES (MANDAVIA), LTD.; TEAM PHYSICIANS OF NEVADA-MANDAVIA, P.C.; and CRUM STEFANKO AND JONES, LTD.,

Respondents.

STIPULATED MOTION FOR EXTENSION TO FILE OPENING BRIEF AND APPENDIX

Appellants move for an unopposed 60-day extension, through April 18, 2023, of appellants' deadline to file the opening brief and appendix. NRAP 31(b)(3)(B). Because of circumstances surrounding the pregnancy of Dan Polsenberg's daughter, he may not be available from January 18 through February 17, 2023. He may have to take primary care of his young granddaughter under these circumstances. While he may not be occupied this entire period, because of the uncertainties of pregnancy, labor, and birth, he feels he must block off at least this period.

This extension is especially appropriate here, as this case raises

important arguments on major issues of first impression. And the brief is currently due on the last day of this period.

Appellants' counsel apologizes for any inconvenience but believes it is in the parties' and the Court's best interest to have an opening brief that comprehensively articulates the issues and arguments.

Respondents have graciously stipulated to this motion.

Dated this 18th day of January, 2023.

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By: <u>/s/ Daniel F. Polsenberg</u>

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CERTIFICATE OF SERVICE

I certify that on January 18, 2023, I submitted the foregoing "Stipulated Motion for Extension to File Opening Brief and Appendix" for filing *via* the Court's eFlex electronic filing system. Electronic notification will be sent to the following:

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