

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

UNITED HEALTHCARE  
INSURANCE COMPANY; UNITED  
HEALTH CARE SERVICES, INC.;  
UMR, INC.; SIERRA HEALTH AND  
LIFE INSURANCE COMPANY,  
INC.; and HEALTH PLAN OF  
NEVADA, INC.,

Appellants,

vs.

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

Respondents.

Case No. 85525      Electronically Filed  
Sep 13 2023 03:01 PM  
Elizabeth A. Brown  
Clerk of Supreme Court  
Appeal from the Eighth Judicial  
District Court, Case No.: A-19-  
792978-B; Dept. No.: 27

**EMERGENCY DEPARTMENT PRACTICE MANAGEMENT  
ASSOCIATION'S MOTION FOR EXTENSION OF TIME TO FILE  
MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF**

(In support of Respondents' Answering Brief)

Under NRAP 26(b) and 27, the Emergency Department Practice Management Association (EDPMA), a proposed *amicus curiae*, moves for a modest two-week extension to file its Motion for Leave to File Amicus Curiae Brief in support of Respondents' Answering Brief.

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**I. There Is Good Cause to Grant a Modest Two-Week Extension.**

**A. The current due date and the requested extension.**

EDPMA's Motion for Leave to File Amicus Curiae Brief in support of Respondent's Answering Brief is currently due on September 19, 2023. EDPMA respectfully requests a modest two-week extension to file its Motion for Leave to File Amicus Curiae Brief, which would make it due on October 3, 2023.

**B. Prior requests for extension.**

EDPMA has sought one previous extension. Pursuant to NRCP 26(b) (1)(B), EDPMA requested by telephone a single 14-day extension of time to file its Motion for Leave to File Amicus Curiae Brief extending the original due date of September 5, 2023 to September 19, 2023. On August 31, 2023 the Court granted the request and entered an Order Granting Telephonic Extension, resulting in EDPMA's current deadline of September 19, 2023. EDPMA has not had any requests for extensions of time denied or denied in part.

**C. There is good cause to grant the extension.**

A two-week extension is needed due to Mr. Carbajal's current workload and calendar. Mr. Carbajal was retained by EDPMA on or about August 31, 2023. The Court is aware of the complexity of the appeal and the voluminous briefs that have been filed. Mr. Carbajal needs ample time to review the hundreds of pages of records to familiarize himself with the relevant legal issues and record. Apart from this case,

Mr. Carbajal has a heavy caseload and upcoming deadlines which require his immediate attention. Given these conflicts, as well as the complicated issues regarding the appeal, an additional two weeks is needed for EDPMA and its Counsel to finalize and file its Motion for Leave to File Amicus Curiae Brief. This motion is made in good faith and not interposed for delay. Further, the modest extension requested will not burden or prejudice any parties involved.

## **II. Conclusion**

Based on the foregoing, EDPMA respectfully requests a two-week extension to file its Motion for Leave to File Amicus Curiae Brief.

DATED this 13<sup>th</sup> day of September, 2023.

CARBAJAL LAW

/s/ Hector J. Carbajal II  
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### **CERTIFICATE OF SERVICE**

Pursuant to Nevada Rule of Appellate Procedure 25(b), I hereby certify that on the 19th day of September, 2023, a true and correct copy of the **EMERGENCY DEPARTMENT PRACTICE MANAGEMENT ASSOCIATION'S MOTION FOR EXTENSION OF TIME TO FILE MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF** was served by electronic means on all persons registered for service in the Court's Electronic Filing system.

/s/ Brittany Friedman  
An employee of Carbajal Law