

In the Supreme Court 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.

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Elizabeth A. Brown
Clerk of Supreme Court

Case No. 85525

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

Petitioners,

vs.

THE EIGHTH JUDICIAL DISTRICT COURT of the State
of Nevada, in and for the County of Clark; and the
Honorable NANCY L. ALLF, District Judge,

Respondents,

vs.

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

Real Parties in Interest.

Case No. 85656

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF

Appellants/petitioners United Healthcare Insurance Company
("UHIC"), United Health Care Services Inc. ("UHS"), which does

business as UnitedHealthcare or “UHC” and through UHIC), UMR, Inc. (“UMR”), Sierra Health and Life Insurance Company (“SHL”), and Health Plan of Nevada, Inc., request a 90-day extension of time, through January 9, 2024, to file their reply brief. NRAP 31(b)(3). This is the first such request. The brief would otherwise be due October 11, 2023.

Good cause necessitates this extension. This is a complex case, raising novel issues. The record is expansive and requires diligent effort to distill the primary points into cohesive arguments without sacrificing necessary authorities. Both sides have been granted excess pages for their initial briefs. Respondents filed 13 additional appendix volumes to appellants’ 146 volumes. Appellants stipulated to a 90-day extension for respondents’ enlarged answering brief and request a similar extension for their reply.

Additionally, appellants’ counsel have been engulfed in preparing for three Supreme Court arguments, along with a fourth argument on dispositive motions in federal district court, among other pressing matters this month. The timing of respondent’s brief and those of amici also means that lead appellate counsel has been and will be unavailable

for much of time that would otherwise been devoted to preparing the reply, including long-planned out-of-state travel with family this past week and multiple meetings of professional associations throughout October.

Undersigned counsel has conferred with respondents/real parties in interest's counsel, Justin Fineberg, who does not oppose this motion. The courtesy is appreciated.

Dated this 29th day of September, 2023.

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CERTIFICATE OF SERVICE

I certify that on September 29, 2023, I submitted the foregoing motion for filing *via* the Court's eFlex electronic filing system.

Electronic notification will be sent to the following:

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I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage prepaid, at Las Vegas, Nevada, addressed as follows:

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