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Elizabeth A. Brown
Nevada Supreme Court

IN THE SUPREME COURT OF THE STATE OF NEVADA

UNITED HEALTHCARE
INSURANCE COMPANY, a
Connecticut corporation; UNITED
HEALTHCARE SERVICES, INC.,
d/b/a UNITEDHEALTCARE, a
Minnesota corporation; UMR, INC.,
d/b/a UNITED MEDICAL
RESOURCES, a Delaware corporation;
SIERRA HEALTH AND LIFE
INSURANCE COMPANY, INC., a
Nevada corporation; and HEALTH
PLAN OF NEVADA, INC., a Nevada
corporation,

Appellants,

vs.

FREMONT EMERGENCY
SERVICES (MANDAVIA), LTD., a
Nevada professional corporation;
TEAM PHYSICIANS OF NEVADA-
MANDAVIA, P.C., a Nevada
professional corporation; CRUM
STEFANKO AND JONES, LTD.,
d/b/a RUBY CREST EMERGENCY
MEDICINE, a Nevada professional
corporation,

Respondents.

Supreme Court No. 85525

Combined with

Supreme Court No. 85656

District Court No. A7292978

**STIPULATED MOTION TO EXTEND
THE TIME FOR RESPONDENTS TO
FILE AN ANSWERING BRIEF**

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1 Pursuant to NRAP 26(b)(1), 27(a)(1), and 31(b)(3), Respondents move for
2 an unopposed request to extend the deadline to file their Answering Brief.
3 Specifically, Respondents request that this Court grant them a 90-day extension
4 to file their Answering Brief. Respondents' current deadline is May 30, 2023,¹
5 and this proposed extension would give Respondents until August 28, 2023, to
6 file their Answering Brief. This is Respondents' first such request for an
7 extension.

8 Good cause supports this requested extension. Appellants' Opening Brief
9 contains 38,528 words (more than 2.5 times the imposed word limit), and their
10 appendix alone spans 146 volumes. Based solely on the sheer amount of content
11 Respondents must sift through, and the level of detail required to address each
12 issue (many of which are questions of first impression), Respondents need more
13 time to adequately brief this Court.

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18 ¹ See Order Granting Motions to Seal and to Exceed Word Limits (Apr. 27,
19 2023). Respondents note that their 30-day deadline as set by the Court falls
20 upon the Saturday, May 27, 2023, which would normally push their deadline to
Monday, May 29, 2023. Given that May 29, 2023, is Memorial Day, a
nonjudicial day, that deadline gets pushed again to Tuesday, May 30, 2023.
Respondents have calculated their proposed 90-day extension from this date.

Appellants were also allowed several months to file their Opening Brief, by virtue of the multiple stays imposed and extensions granted. As a reciprocal courtesy, Appellants have consented to this proposed extension as well.

DATED this 10th day of May, 2023.

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CERTIFICATE OF SERVICE

I certify that I am an employee of BAILEY ♦ KENNEDY and that on the 10th day of May, 2023, service of the foregoing **STIPULATED MOTION TO EXTEND THE TIME FOR RESPONDENTS TO FILE AN ANSWERING BRIEF** was made by electronic service through Nevada Supreme Court's electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known address:

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