Case No. 85850

In the Supreme Court of Nevada

A CAB SERIES LLC, f/k/a/; A CAB, LLC,

Appellant,

vs.

MICHAEL MURRAY; and MICHAEL RENO, individually and on behalf of others similarly situated,

Respondents.

MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S OPENING BRIEF AND APPENDIX

Appellant requests a 30-day extension of time in which to file the

opening brief and appendix, until and including December 27, 2023.

NRAP 31(b)(3). The opening brief is currently due November 27, 2023.

This would be appellant's second extension; the parties previously stipulated to a 30-day extension.

Good cause necessitates this extension. Although appellate counsel has been diligent in their efforts to complete the brief, other extenuating circumstances have caused delay in its completion. The attorney primarily responsible for drafting the brief traveled to the East Coast to spend time with his terminally ill family member. This visit—which was precious time from the outset—has since morphed into an extended

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caretaking stay. The only two other family members in the area contracted COVID before the holiday and are currently recovering in quarantine. They cannot assist with the care of their terminally ill relative.

The supervising attorney who would ordinarily step in to draft has been in the process of moving his family to a new residence, which became unforeseeably complicated. This attorney has also been delayed while taking care of three of his family members who fell ill.

Added to this, it was extraordinarily difficult to obtain alternative help given that several attorneys who work with the team were also out-of-state or hosting family for the holiday. The paralegal and staff members tasked with preparing the appendix likewise fell ill before the holiday. At least one of them was positive for COVID. COVID or not, their symptoms were severe and impacted the workload they could take on.

There is good cause to extend the deadline. This is a complex case. The record is expansive and requires diligent effort to distill the primary points into cohesive arguments without sacrificing necessary authorities. Appellants sincerely appreciate the Court's consideration.

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Dated this 27th day of November, 2023.

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CERTIFICATE OF SERVICE

I certify that on November 27, 2023, I submitted the foregoing

"Motion for Extension of Time to File Appellant's 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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