

**In the Supreme Court of Nevada**

KEON KHIABANI, an individual; ARIA KHIABANI, an individual; SIAMAK BARIN, as executor of the ESTATE OF KAYVAN KHIABANI, M.D. (decedent); THE ESTATE OF KAYVAN KHIABANI, M.D. (decedent); SIAMAK BARIN, as executor of the ESTATE OF KATAYOUN BARIN, DDS (decedent); and the ESTATE OF KATAYOUN BARIN, DDS (decedent),

Appellants,

*vs.*

MOTOR COACH INDUSTRIES, INC.,

Respondent.

Electronically Filed  
Jan 19 2024 11:03 PM  
Elizabeth A. Brown  
Clerk of Supreme Court

**UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO FILE ANSWERING BRIEF**

Respondent, Motor Coach Industries, Inc., requests a 60-day extension, through March 19, 2024, to file its answering brief and cross-appeal opening brief. NRAP 31(b)(3)(C). This is the first such motion related to this brief. The brief was previously extended by stipulation from December 19, 2023 to its current due date of January 19, 2023.

Good cause exists to grant the requested extension. One of the primary attorneys working on this matter departed from the firm, and another primary attorney working on the matter is on an un-expected temporary leave of absence. An additional attorney working on the matter has had to take several days away from work due to ill-ness and continues to feel the lingering effects of illness, all while try-ing to juggle a multi-week jury trial, a three-day preliminary-injunction hearing, preparation for a Court of Appeals argument next Thursday, and myriad deadlines in his other cases.

In these exigent circumstances, the firm worked rapidly to staff the case with an additional attorney. She has been working diligently to complete the brief but required time to familiarize herself with the voluminous record in this case. The requested extension will allow undersigned counsel to appropriately brief this substantial issue for the Court with appropriate authorities.

Counsel has conferred with appellant/cross-respondent's counsel, Micah Echols, who does not oppose this motion. The courtesy is appreciated.

The additional time will enable counsel to ensure that the factual record is made appropriately clear, the brief is concise, and that it adequately responds to the significant legal issues raised in the initial brief. Respondent sincerely appreciates the Court's consideration. The additional time will enable counsel to ensure that the factual record is made appropriately clear, the brief is concise, and that it adequately responds to the significant legal issues raised in the initial brief.

Respondent sincerely appreciates the Court's consideration.

Dated this January 19, 2024.

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**CERTIFICATE OF SERVICE**

I certify that on January 19, 2024, I submitted the foregoing  
“Unopposed Motion for Extension Of Time To File Answering Brief” for  
filing *via* the Court’s eFlex electronic filing system. Electronic  
notification will be sent to the following:

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