

**In the Supreme Court of Nevada**

Estate of MARY CURTIS; and  
LAURA LATRENTA, individually  
and as personal representative  
of the Estate of MARY CURTIS,

Appellants,

*vs.*

SOUTH LAS VEGAS MEDICAL INVESTORS,  
LLC dba LIFE CARE CENTER OF SOUTH  
LAS VEGAS f/k/a LIFE CARE CENTER OF  
PARADISE VALLEY; SOUTH LAS VEGAS  
INVESTORS LIMITED PARTNERSHIP;  
LIFE CARE CENTERS OF AMERICA, INC.;  
and CARL WAGNER, Administrator,

Respondents.

Electronically Filed  
Sep 16 2019 05:19 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

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

Respondents request an extension of 30 days, through October 16, 2019, to file the opening brief and appendix. NRAP 31(b)(3). This is the first such motion. (The parties previously stipulated to extend the deadline pursuant to NRAP 31(b)(2).) The brief was originally due August 16 and without the extension, would be due September 16. No requests for extension have been denied or denied in part.

Additional time is necessary to complete the brief. The attorney who was primarily responsible for drafting the answering brief is facing

a family emergency. A close relative was recently diagnosed with aggressive, late-stage lymphoma. Another close relative recently suffered from a stroke. As a consequence, another attorney has been asked to assist in the preparation of the answering brief; however, additional time is necessary for that attorney to become familiar with the record and the legal issues. The requested extension will allow counsel to attend to this family emergency and prepare a brief that streamlines the issues on appeal.

And although counsel understands that caseload does not by itself require an extension in the absence of other circumstances, counsel has also faced extraordinary demands with an evidentiary hearing and several emergency filings in a high-profile case. Counsel's *pro bono* cases have also required significant time away from the preparation of this brief, including the preparation for a *pro bono* argument in *Paulos*

*v. FCH1, LLC*, Docket No. 74912, before the *en banc* Court on October 7.

This Court's courtesy is appreciated.

Dated this 16th day of September, 2019.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/Abraham G. Smith  
DANIEL F. POLSENBERG (SBN 2376)  
JOEL D. HENRIOD (SBN 8492)  
ABRAHAM G. SMITH (SBN 13250)  
3993 Howard Hughes Parkway,  
Suite 600  
Las Vegas, Nevada 89169  
(702) 949-8200  
*Attorneys for Respondents*

**CERTIFICATE OF SERVICE**

I certify that on September 16, 2019, I submitted the foregoing  
“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:

MICHAEL DAVIDSON (SBN 878)  
400 S. Rampart Blvd., Suite 400  
Las Vegas, Nevada 89145  
(702) 362-7800  
[MDavidson@KLNevada.com](mailto:MDavidson@KLNevada.com)

MELANIE L. BOSSIE (*pro hac vice*)  
BOSSIE REILLY & OH, P.C.  
15333 N. Pima Road, Suite 300  
Scottsdale, Arizona 85260  
(602) 553-4552

BENNIE LAZZARA, JR.  
WILKES & MCHUGH, P.A.  
One North Dale Mabry Hwy.  
Suite 700  
Tampa, Florida 33609

*Attorneys for Appellants*

/s/ Lisa M. Noltie  
An Employee of Lewis Roca Rothgerber Christie LLP