Case No. 79396

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,

Electronically Filed Mar 19 2020 05:53 p.m. Elizabeth A. Brown Clerk of Supreme Court

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.

MOTION FOR EXTENSION TO FILE RESPONDENTS' ANSWERING BRIEF

Respondents move to extend the deadline for filing the answering brief through April 20, 2020. NRAP 31(b)(3). This is the first motion for extension. (The parties previously stipulated to extend the deadline pursuant to NRAP 31(b)(2).) The brief was originally due February 18, 2020 and, without an extension, would be due March 19, 2020. No request for additional time has been denied or denied in part.

Although respondents have prepared a draft brief, extraordinary circumstances make the requested extension is necessary. Restrictions

stemming from the Coronavirus pandemic have created urgent changes in other cases and made it difficult for counsel to confer to finalize the brief for filing. Lead appellate counsel was also out of the country and only recently returned.

The requested extension will allow respondents to streamline the issues for this Court's consideration. Respondents appreciate the Court's courtesy in light of these circumstances.

Dated this 19th day of March, 2020.

S. Brent Vogel (SBN 6858) Lewis Brisbois Bisgaard & Smith 6835 S. Rainbow Blvd., Ste. 600 Las Vegas, Nevada 89118 (702) 893-3383 LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/ Abraham G. Smith
DANIEL F. POLSENBERG (SBN 2376)
JOEL D. HENRIOD (SBN 8492)
ABRAHAM G. SMITH (SBN 13,250)
3993 Howard Hughes Pkwy., Ste. 600
Las Vegas, Nevada 89169
(702) 949-8200

Attorneys for Respondents

CERTIFICATE OF SERVICE

I hereby certify that that this document was filed electronically with the Nevada Supreme Court on March 19, 2020. Electronic service of the foregoing "Motion for Extension to File Respondents' Answering Brief" shall be made in accordance with the Master Service List.

MICHAEL DAVIDSON KOLESAR & LEATHAM 400 S. Rampart Blvd. Suite 400 Las Vegas, Nevada 89145 (702) 362-7800

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:

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

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

<u>/s/Jessie M. Helm</u> An employee of Lewis Roca Rothgerber Christie LLP