

1                   **IN THE SUPREME COURT OF THE STATE OF NEVADA**

2           BANK OF AMERICA, N.A.; AND THE  
3           BANK OF NEW YORK MELLON,  
4           F/K/A THE BANK OF NEW YORK, AS  
5           TRUSTEE FOR THE  
6           CERTIFICATEHOLDERS OF CWALT,  
7           INC., ALTERNATIVE LOAN TRUST  
8           2006 J-8, MORTGAGE PASS-  
9           THROUGH CERTIFICATES, SERIES  
10          2006-J8,

11                   Appellants,

12           vs.

13           NV EAGLES, LLC,

14                   Respondent.

Case No.: 81239

Electronically Filed  
Jan 27 2021 04:36 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

15                   **UNOPPOSED MOTION TO EXTEND TIME TO FILE ANSWERING BRIEF**

16                                   Joseph Y. Hong, Esq.  
17                                   State Bar No. 005995  
18                                   HONG & HONG LAW OFFICE  
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23                                   Attorney for Respondent  
24  
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1 COMES NOW Respondent, NV Eagles, LLC (**Respondent**), by and through its  
2 respective counsel of record, Joseph Y. Hong, Esq., and hereby moves this Court for a  
3 thirty-day extension of time to file its answering brief. This Motion is based on the  
4 following Memorandum of Points and Authorities, and the papers and pleadings on  
5 file.  
6

- 7 i. The answering brief is currently due on January 27, 2021.
- 8 ii. This Court previously granted a 30-day extension pursuant to a  
9 stipulation.
- 10 iii. This is the first unopposed motion for an extension.
- 11 iv. No requests for extension of time have been denied.
- 12 v. Counsel for Appellants has informed counsel for Respondent that she  
13 does not oppose this extension request.
- 14 vi. Good cause and extraordinary and compelling circumstances exist for an  
15 extension because of the restrictive measures caused by the COVID-19 virus  
16 pandemic. These restrictive measures have directly affected counsel, and have  
17 impacted counsel's ability to complete the answering brief by the current deadline.  
18 Further, the structural changes implemented as a result of the COVID-19 virus  
19 pandemic and counsel continuing to work remotely/off-site overseas, have, and  
20 continue to impact counsel's ability to dedicate necessary resources to finalizing the  
21 answering brief. Given these impediments, the requested extension is necessary to  
22 allow counsel to fully address the issues raised in the appeal.  
23  
24  
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vii. Respondent requests an extension up to and including February 26, 2021 to file its answering brief. This request for an additional extension is made in good faith and not for the purpose of delay.

DATED this 27<sup>th</sup> day of January, 2021.

HONG & HONG LAW OFFICE

/s/ Joseph Y. Hong

JOSEPH Y. HONG, ESQ.

State Bar No. 005995

1980 Festival Plaza Drive, Suite 650

Las Vegas, Nevada 89135

Attorney for Respondent

## CERTIFICATE OF SERVICE

I certify that I am an employee of Joseph Y. Hong, Esq., and on this 27<sup>th</sup> day of January, 2021, I served the foregoing **UNOPPOSED MOTION TO EXTEND TIME TO FILE ANSWERING BRIEF** by electronic transmission through the Court's electronic filing system upon each party in this case who is registered and listed as an electronic case filing user with the Clerk.

By: /s/ Debra L. Batesel

An employee of Joseph Y. Hong, Esq.