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Attorneys for Appellant

HARVEST MANAGEMENT SUB LLC

IN THE SUPREME COURT OF THE STATE OF NEVADA

HARVEST MANAGEMENT SUB
LLC, a foreign limited liability
company

Appellant,

vs.

AARON M. MORGAN, individually

Respondent.

Supreme Court No. 85834

District Court No. A718679

**STIPULATED MOTION TO EXTEND
TIME TO FILE OPENING BRIEF AND
JOINT APPENDIX**

Pursuant to NRAP 26(b)(1), 27(a)(1), and 31(b)(3), Harvest Management Sub LLC (“Harvest”) moves for an unopposed request to extend the deadline to file its Opening Brief. Specifically, Harvest requests that this Court grant them a 60-day extension to file their Opening Brief. Harvest’s current deadline is

Electronically Filed
May 17 2023 10:00 AM
Elizabeth A. Brown
Clerk of Supreme Court

1 May 18, 2023,¹ and this proposed extension would give Harvest until July 17,
2 2023, to file its Opening Brief. This is Harvest's second request for an
3 extension.

4 Good cause supports this requested extension. First, the parties have
5 been engaged in substantial posttrial motion practice regarding attorneys' fees
6 and costs. The parties have also initiated postjudgment discovery. Significant
7 time has been diverted to address these issues.

8 Second, on May 8, 2023, Harvest timely filed a Rule 60(b) motion with
9 the district court. That Rule 60(b) motion calls into question certain issues that
10 are now presented to this Court on appeal. The district court's resolution of this
11 Rule 60(b) motion may accordingly narrow the scope of the issues at trial,
12 promote settlement of this case, and implicate the limited remand procedures

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20 ¹ See Order Approving Stipulation (Apr. 25, 2023).

clarified in *Foster v. Dingwall*, 126 Nev. 49, 52-53, 228 P.3d 453, 455 (2010).

Morgan does not oppose this request and has consented to it.

Dated this 17th day of May, 2023.

Dated this 17th day of May, 2023.

BAILEY ♦ KENNEDY

CLAGGETT & SYKES LAW FIRM

By: /s/ Tayler D. Bingham

By: /s/ Micah S. Echols

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CERTIFICATE OF SERVICE

I certify that I am an employee of BAILEY ♦ KENNEDY and that on the 17th day of May, 2023, service of the foregoing **STIPULATED MOTION TO EXTEND TIME TO FILE OPENING BRIEF AND JOINT APPENDIX** was made by electronic service through Nevada Supreme Court's electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known address:

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