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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

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1 July 17, 2023,<sup>1</sup> and this proposed extension would give Harvest until September  
2 15, 2023, to file its Opening Brief. This is Harvest’s third request for an  
3 extension.

4 Good cause supports this requested extension. First, the parties are  
5 currently engaged in good-faith settlement negotiations using the assistance of a  
6 mutually-acceptable third-party neutral (the Honorable Justice Abbi Silver  
7 (R.)).

8 Second, the parties have been engaged in significant posttrial motion  
9 practice that has consumed the parties’ time. The district court has recently  
10 ruled on Harvest’s Rule 60(b) motion, and Harvest intends to file a Notice of  
11 Appeal with respect to that order. Accordingly, the parties intend to file a  
12 separate motion to consolidate the two appeals and address these recently-  
13 decided issues at the outset of the parties’ briefings.

14 Third, Harvest’s counsel has had significant trial obligations throughout  
15 the month of June that has prevented Harvest from adequately briefing the  
16 issues. Harvest’s counsel will continue to be occupied in July and August with  
17 additional jury trial obligations.

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20 <sup>1</sup> See Order Granting Motion (May 25, 2023).

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

Dated this 13th day of July, 2023.

Dated this 13th day of July, 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 13th day of July, 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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