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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PlayUp, Inc., a Delaware corporation,

Plaintiff,

v.

Dr. Laila Mintas, an individual,

Defendant.

Case No. 2:21-cv-02129-GMN-NJK

**[UNOPPOSED] DR. LAILA MINTAS’
MOTION TO EXTEND TIME TO FILE
REPLY IN SUPPORT OF RENEWED
MOTION FOR DISCOVERY SANCTIONS**

(First Request)

Dr. Laila Mintas, an individual,

Counterclaimant,

v.

PlayUp, Inc., a Delaware corporation; PlayUp
Ltd., an Australian company; Daniel Simic,
an individual,

Counterdefendants.

Pursuant to LR IA 6-1, Defendant/Counterclaimant Dr. Laila Mintas (“Dr. Mintas”), by and through her counsel of record, Naylor & Braster, hereby files this Motion to Extend Time to File Reply In Support of Renewed Motion for Discovery Sanctions (“Motion for Discovery Sanctions”). This is Dr. Mintas’ first requested extension. Dr. Mintas’ Motion for Discovery Sanctions was filed on October 31, 2022. (ECF No. 239). Dr. Mintas respectfully requests a 2-day extension or until November 23, 2022, to file her reply brief. This extension is sought in good faith and not to cause delay or prejudice to any party but rather due to the following factors as set forth in the accompanying declarations of Jennifer L. Braster, Benjamin Gordon, and Meredith Markwell:

1. Between November 21, 2022 and November 29, 2022, Dr. Mintas has four briefs due in this matter: Reply In Support of Motion to Disqualify (ECF No. 238) (currently due November 21, 2022), Reply In Support of Renewed Motion for Discovery Sanctions (currently due November 21, 2022) (ECF No. 239), Response to PlayUp Inc.’s Motion for Sanctions Pursuant to Rule 11 (currently due November 28, 2022) (ECF No. 246), and Response to PlayUp Inc.’s Countermotion for Sanctions (ECF No. 257) (currently due November 29, 2022).
2. Dr. Mintas requested an extension until November 23, 2022, to file her reply brief in support of the Motion for Discovery Sanctions as well as various extensions for the other briefs as set forth in Exhibit 1 to Ms. Braster’s declaration.
3. PlayUp Inc.’s counsel agreed to this requested extension. (Exhibit 1).
4. This request is sought for the following reasons:
 - a. Lead counsel, Jennifer Braster, was in an all-day mediation on November 15, 2022. (Braster Decl. at ¶ 4).
 - b. Lead counsel, Jennifer Braster, has a continued trial on November 21 and 22, 2022. (*Id.* at ¶ 5).

1 c. Lead counsel, Jennifer Braster, has family traveling to Nevada from
2 November 16 through November 21, 2022, for the Thanksgiving holiday.
3 (*Id.* at ¶ 6).

4 d. Co-counsel, Meredith Markwell, is traveling out of state from November 19
5 through 27, 2022, for the Thanksgiving holiday. (Markwell Decl. at ¶ 3).

6 e. Co-counsel, Benjamin Gordon, is traveling out of state from November 19
7 through 26, 2022, for the Thanksgiving holiday. (Gordon Decl. at ¶ 3).

8 5. As set forth above, Dr. Mintas respectfully requests an extension to file her reply
9 brief until December 2, 2022, due to pre-arranged travel for the holiday, lead
10 counsel's mediation and 2-day trial during this time, and three other briefs due in
11 this matter.

12 Dated: November 16, 2022

NAYLOR & BRASTER


13 By: /s/ Jennifer L. Braster

14 Jennifer L. Braster, NBN 9982
15 Meredith L. Markwell, NBN 9203
16 Benjamin B. Gordon, NBN 15552
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17 *Attorneys for Dr. Laila Mintas*

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19 **IT IS SO ORDERED.**

20 Dated: November 17, 2022

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23 United States Magistrate Judge
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