

1 Jennifer L. Braster
2 Nevada Bar No. 9982
3 Meredith L. Markwell
4 Nevada Bar No. 9203
5 Benjamin B. Gordon
6 Nevada Bar No. 15552
7 NAYLOR & BRASTER
8 1050 Indigo Drive, Suite 200
9 Las Vegas, NV 89145
10 Telephone: (702) 420-7000
11 Facsimile: (702) 420-7001
12 jbraster@nblawnv.com
13 *Attorneys for Dr. Laila Mintas*

9
10 **UNITED STATES DISTRICT COURT**
11
12 **DISTRICT OF NEVADA**

13 PlayUp, Inc., a Delaware corporation,

14 Plaintiff,

15 v.

16 Dr. Laila Mintas, an individual,

17 Defendant.

18 Dr. Laila Mintas, an individual,

19 Counterclaimant,

20 v.

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

24 Counterdefendants.

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

13 **[UNOPPOSED] DR. LAILA MINTAS'**
14 **MOTION TO EXTEND TIME TO FILE**
15 **RESPONSE TO COUNTERMOTION FOR**
16 **SANCTIONS**

17 **(First Request)**

1 Pursuant to LR IA 6-1, Defendant/Counterclaimant Dr. Laila Mintas (“Dr. Mintas”), by
 2 and through her counsel of record, Naylor & Braster, hereby files this Motion to Extend Time to
 3 File Response to Countermotion for Sanctions (“Countermotion for Sanctions”). This is Dr.
 4 Mintas’ first requested extension. PlayUp Inc.’s Countermotion for Sanctions was filed on
 5 November 15, 2022. (ECF No. 257). Dr. Mintas respectfully requests a 3-day extension or until
 6 December 2, 2022, to file her response. This extension is sought in good faith and not to cause
 7 delay or prejudice to any party but rather due to the following factors as set forth in the
 8 accompanying declarations of Jennifer L. Braster, Benjamin Gordon, and Meredith Markwell:

- 9 1. Between November 21, 2022 and November 29, 2022, Dr. Mintas has four briefs
 10 due in this matter: Reply In Support of Motion to Disqualify (ECF No. 238)
 11 (currently due November 21, 2022), Reply In Support of Renewed Motion for
 12 Discovery Sanctions (currently due November 21, 2022) (ECF No. 239), Response
 13 to PlayUp Inc.’s Motion for Sanctions Pursuant to Rule 11 (currently due
 14 November 28, 2022) (ECF No. 246), and Response to PlayUp Inc.’s Countermotion
 15 for Sanctions (ECF No. 257) (currently due November 29, 2022).
- 16 2. Dr. Mintas requested an extension until December 2, 2022, to file her response to
 17 the Countermotion for Sanctions as well as various extensions for the other briefs
 18 as set forth in Exhibit 1 to Ms. Braster’s declaration.
- 19 3. PlayUp Inc.’s counsel agreed to this requested extension so long as PlayUp Inc. is
 20 provided the same extension for the reply. Dr. Mintas has no objection to that
 21 request. (Exhibit 1).
- 22 4. This request is sought for the following reasons:
 - 23 a. Lead counsel, Jennifer Braster, was in an all-day mediation on November
 24 15, 2022. (Braster Decl. at ¶ 4).
 - 25 b. Lead counsel, Jennifer Braster, has a continued trial on November 21 and
 26 22, 2022. (*Id.* at ¶ 5).

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

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

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

5. As set forth above, Dr. Mintas respectfully requests an extension to file her response until December 2, 2022, due to pre-arranged travel for the holiday, lead counsel's mediation and 2-day trial during this time, three other briefs due in this matter, as well as the extended length of PlayUp Inc.'s Counter-motion for Sanctions (as the response and Counter-motion for Sanctions total 36 pages).

Dated: November 16, 2022

NAYLOR & BRASTER

By: /s/ *Jennifer L. Braster*

Jennifer L. Braster, NBN 9982
Meredith L. Markwell, NBN 9203
Benjamin B. Gordon, NBN 15552
1050 Indigo Drive, Suite 200
Las Vegas, NV 89145

Attorneys for Dr. Laila Mintas

IT IS SO ORDERED.

Dated: November 17, 2022

United States Magistrate Judge