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IN THE SUPREME COURT OF THE STATE OF NEVADA

ROBERT SCOTLUND VAILE,

Petitioner,

vs.

CISILIE A. PORSBOLL, f/k/a CISILIE A. VAILE,

Respondent.

S.C. DOCKET NO.: 52593
D.C. CASE NO.: D-98-230385-D

FILED

MAY 08 2009

TRACIE K. LINDEMAN
CLERK OF SUPREME COURT
BY *R. Malone*
DEPUTY CLERK

**MOTION FOR
EXTENSION OF TIME TO FILE ANSWER TO
PETITION FOR EN BANC RECONSIDERATION**

Respondent, CISILIE A. PROSBOLL, by and through her attorneys of the WILLICK LAW GROUP, respectfully requests that this Court enter an order granting her a 30 day extension of time within which to file her *Answer* as requested by the Court.

This Motion is based upon the Points and Authorities below, and is made in good faith and not to delay justice.

DATED this 6th day of May 2009.

WILLICK LAW GROUP



MARSHAL S. WILLICK, ESQ.
Nevada Bar No. 002515
RICHARD L. CRANE, ESQ.
Nevada Bar No. 009536
3591 East Bonanza Road, Suite 200
Las Vegas, Nevada 89110-2101
(702) 438-4100

RECEIVED

MAY 08 2009

TRACIE K. LINDEMAN
CLERK OF SUPREME COURT
DEPUTY CLERK

1 POINTS AND AUTHORITIES

2 Respondent's counsel does not believe that a proper response can be adequately completed
3 within the amount of time allotted, and therefore brings this *Motion* for an extension of time within
4 which to file an *Answer*.

5 The rules of this Court provide for extension request for good cause, although they are not
6 favored. Counsel has been on this case now for over ten years, and has had to respond in eight
7 different courts dealing with the numerous filing made by Mr. Vaile.¹ This has caused the history
8 of this case to be somewhat messy, and has made our task to make all matters as clear and
9 comprehensible as possible, more difficult.

10 In order to provide an answer which will assist the court in resolving the issues presented,
11 a greater amount of detail will be required in order to present a precise and coherent *Answer* than can
12 be addressed in the time frame provided. While this is not a significant problem it does require time
13 to identify documents, filing dates, dates of entry of orders, and to verify whether documents
14 necessary to the issues are, in fact, provided. Basically, counsel will have to create demonstratives,
15 and an index to adequately *Answer*.

16 Due to the issues presented in the *Petition for En Banc Reconsideration*, and its technical and
17 historical deficiency, additional time is required. Also, as the Court may be aware, Petitioner, has
18 also filed another appeal in the same case, which until a few days ago we were unaware. This
19 Appeal is part and parcel of this Court's request and will need to be addressed as part of our *Answer*.²
20 Counsel will attempt to format the *Answer* in such a way that the Court can efficiently and
21 economically consider each issue raised in the *Petition for En Banc Reconsideration*.

22 Respondent's counsel respectfully submits that it cannot do what needs to be accomplished
23 by the May 8, 2009, date and therefore respectfully requests that this court grant Respondent an
24 additional 30 days within which to file the *Answer*.

26 ¹ There have been five filings to this Court alone, Supreme Court Case No.s: 51981, was dismissed; 52244,
27 dismissed; 52457, dismissed; 52593, dismissed, rehearing denied, and now petitioned for en banc reconsideration; and
28 now Case No. 53687.

² Docket No. 53687.

1 Counsel is sensitive to this Court's prior instructions to request – once – sufficient time to
2 complete an *Answer* or brief, rather than requesting a series of smaller extensions. Absent
3 extenuating circumstances not now foreseen, we should be able to file the *Answer* within a single
4 additional 30-day extension, and have it filed before the end of that time.

5 There are currently no proceeding scheduled in this case, and therefore there is no reasonable
6 prejudice to either party if the time for *Respondent's Answer* is delayed for 30 days.

7 DATED this 6th day of May 2009.

8 WILLICK LAW GROUP

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18 Attorneys for Respondent
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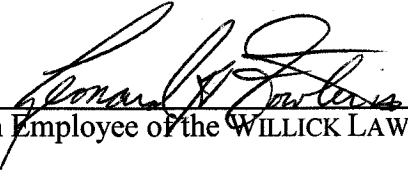
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CERTIFICATE OF MAILING

I hereby certify that I am an employee of the WILLICK LAW GROUP and on the 6th day of May 2009, I deposited in the United States Mail, postage prepaid, at Las Vegas, Nevada, a true and correct copy of the *Motion for Extending the Time for Filing of Answer*, addressed to:

Robert Scotlund Vaile
P.O. Box 727
Kenwood, California 95452
Petitioner in Proper Person

This is the address as listed by Petitioner in his pleadings, and there has been communication between the place of mailing and the place so addressed.



An Employee of the WILLICK LAW GROUP

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