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Respondent,

Electronically Filed
Jan 07 2014 12:39 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

CASE NO. 63178

Dist. Ct. Case No. A-11-647850-B

RESPONDENT’S MOTION TO EXTEND TIME TO FILE
ANSWERING BRIEF & APPENDIX

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Attorneys for Respondent

Respondent Ikon Holdings, LLC., by and through its attorneys of record, Adams Law Group, Ltd., and Puoy K. Premsrirut, Esq., Inc., respectfully move this Court for an extension of time for filing its Answering Brief and Appendix.

Pursuant to a stipulation executed by counsel in this matter, a briefing schedule for the filing of the Opening Brief, Answering Brief and Appendix, Reply Brief, and related Amicus briefs and Oppositions was agreed upon (see Docket 13-33111). Pursuant to terms of the Parties' Stipulation, Respondent filed its Answering Brief on January 3rd, 2014, after a number of extensions were granted by Respondent to Appellant to file its Opening Brief. However, due to an error in the uploading of the chronological order of the Appendix, the cites to the Appendix contained in the Answering Brief were incorrect. Therefore, the Appendix was corrected and filed on Sunday, January 5th, 2014. An errata to the Answering Brief was then filed on Monday, January 6th, 2014, to reflect the correct cites to the corrected Appendix and to affix a notary stamp to counsel's signature on a verification and include a table of contents. Other than these corrections, no changes were made to the Answering Brief.

However, because NRAP 31(b)(2) limited the briefing-extension stipulations to a total of 30 days, this Court extended Respondent's Answering Brief for 30 days. While the Order Approving Stipulation for Extension of Time did not state the date that the Answering Brief was due nor stated the beginning of the tolling time for the 30 day extension, upon a review of the Docket Entries, Appellant's Opening Brief was actually filed on November 21, 2013. This would have put the due date for Respondent's Answering Brief at December 23, 2013, not January 3, 2014, as understood and agreed to by counsel. This distinction was not realized until Respondent's counsel spoke with the Court's Clerk on January 6, 2014.

1 Further, during this period of time, counsel for Respondent was required to
2 fly to Thailand for a week to attend to a hospitalized family member recently
3 diagnosed with terminal leukemia. Counsel's necessary and unavoidable absence
4 prolonged the completion of the Answering Brief and Appendix to necessitate the
5 extra time secured to complete the brief..

6
7 T This Court has previously granted one extension file the to file the
8 Answering Brief and Appendix. As noted above, the previous extension was not
9 denied, but only limited in duration as it did not mirror the Parties' Stipulation of
10 dates. . To date, Respondent has filed its Opening Brief (January 3rd, 2014),
11 corrected Appendix (January 5th, 2014,) and Errata to the Opening Brief (January
12 6th, 2014). Respondent, therefore, respectfully requests the Court to extend the
13 time for the filing of the Answering Brief and Appendix to January 6th, 2014.
14 Respondent's Answering Brief is significant in content and length, and the issues
15 raised therein are of great importance to the State of Nevada. This Motion is made
16 in good faith and without the intent to cause unnecessary delay in this appeal.

17 DATED this 6th day of January, 2014.

18
19 PUOY K. PREMSRIRUT, ESQ., INC.

20 /s/ Puoy Premsrirut
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28 *Attorneys for Respondent*

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I electronically filed the forgoing RESPONDENT’S
MOTION TO EXTEND TIME TO FILE ANSWERING BRIEF & APPENDIX with the Clerk of
Court for the Supreme Court of Nevada by using the Supreme Court of Nevada's E-filing system
on January 6, 2014. I further certify that all participants in this case are registered with the
Supreme Court of Nevada's E-filing system, and that service has been accomplished to the
following individuals through the Court's E-filing System:

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/s/ Brandon Dalby
An Employee of PUOY K. PREMSRIRUT, ESQ. INC.