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IN THE SUPREME COURT OF THE STATE OF NEVADA

RAYMOND RIAD KHOURY,

Appellant,

VS.

MARGARET SEASTRAND,

Respondent.

MOTION FOR EXTENSION OF TIME OUR TO FILE APPELLANT'S OPENING BRIEF

Pursuant to NRAP 26(b) and 31(b), Appellant requests up an additional thirty days, up to and including June 6, 2014—or, if the Court grants the parties' stipulation to consolidate the appeals, and Appellant's pending motion to consolidate the briefing schedules for Supreme Court cases, No. 64702, No. 65007, and No. 65172, up to and including July 8, 2014—to complete and file his opening brief.

Appellant's brief is currently due to be filed on May 7, 2014. In addition to the pending stipulation to consolidate cases nos. 64702, 65007, and 65172, and the pending motion to consolidate the briefing schedule, however, the requested transcripts have yet to be filed with the district court. Indeed, on February 21, 2014, Appellant filed his request for Transcripts. On April 14, 2014, Court Reporter Kristy Clark requested a 30-day extension of time to prepare the requested transcripts. Thus, at this time, the transcripts upon which Appellant needs to rely and include in his Appendix on appeal are unavailable. Although it seems unlikely that the Court would expect Appellant to file his opening brief in light of the foregoing procedural and practical hurdles, nonetheless, Appellant seeks an extension of time to file his opening brief out of an abundance of caution. Respondent, moreover, does not oppose Appellant's request and did not oppose Appellant's motion to consolidate the briefing schedule after stipulating to consolidate the appeals.

As demonstrated above, good cause exists for the Appellant's requested extension.

This motion is brought in good faith, and not for the purpose of harassment or delay.

DATED this ____ day of May, 2014.

HALL JAFFE & CLAYTON, LLP

By

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CERTIFICATE OF SERVICE

Pursuant to NRAP 25, I hereby certify that service of the foregoing MOTION FOR EXTENSION OF TIME TO FILE APPELLANT"S OPENING BRIEF was made on this day of May, 2014, by depositing a true and correct copy fo the same by was served upon the parties by the Court's designated electronic filing and service program and/or by placing an original or true copy thereof in a sealed envelope, and depositing it in the U.S. Mail, postage prepaid, at Las Vegas, Nevada, addressed as follows:

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