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IN THE SUPREME COURT OF THE STATE OF NEVADA

RAYMOND RIAD KHOURY,
Appellant,

vs.

MARGARET SEASTRAND,
Respondent.

Electronically Filed
Aug 07 2014 09:03 a.m.
Pracie K. Lindeman
Clerk of Supreme Court
Supreme Court No.: 64707
Supreme Court No.: 65007
Supreme Court No.: 65172

District Court Case No.: A636515

**MOTION FOR EXTENSION TO FILE TO
FILE APPELLANT'S OPENING BRIEF AND
APPENDIX**

Pursuant to NRAP 26(d) and 31(b)(3), Appellant requests an extension of forty-five days, up to and including September 22, 2014, in which to complete and file his Opening Brief and Appendix. Appellant's Opening Brief and Appendix is currently due to be filed on August 27, 2009. This is the second extension requested for this brief. A prior stipulation was granted, moving the deadline for the Opening Brief and Appendix from July 8, 2014 to August 7, 2014.

A combination of various circumstances compel counsel to request this extension of time. First, Steven T. Jaffe and multiple associates are involved in representing a long-standing client—John Davis Trucking—in a federal case involving a collision with an Amtrak train. There are tens of millions of dollars at issue in this trial. While the parties were hopeful that the matter could be resolved prior to trial, no resolution was reached, and Mr. Jaffe is now in the midst of a 6-week federal trial in Reno, Nevada. The trial commenced on August 5, 2014 and is scheduled to run through at least September 12, 2014.

In addition to the ongoing trial, two of Steve Jaffe's associates recently left the firm. One of these associates, Kannon J. Smith, Esq., was designated to work on various aspects of this appeal. The other associate was one of the attorneys helping to cover other cases for the team preparing for and conducting the federal trial. The departure of these associates exacerbated the logjam created by the ongoing federal trial.

As a result of the federal trial, Steven Jaffe, lead appellate counsel on this matter, will not be available for final review, revisions, and approval of the Opening Brief until September 12, 2014. As lead

1 counsel for Mr. Khoury at the trial which resulted in the issues and questions of law which are the subject
2 of this appeal, Mr. Jaffe's input on the Opening Brief is imperative.

3 Appellant makes this request in good faith, and not for the purpose of harassment or delay.

4 DATED this 6 day of August, 2014.

5 HALL JAFFE & CLAYTON, LLP


6
7 By

8 STEVEN T. JAFFE, ESQ.
9 Nevada Bar No. 007035
10 JAMES E. HARPER, ESQ.
11 Nevada Bar No. 009822
12 JACOB S. SMITH, ESQ.
13 Nevada Bar No. 010231
14 7425 Peak Drive
15 Las Vegas, Nevada 89128
16 *Attorney for Appellant*
17 *Raymond Khoury*
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1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRAP 25, I hereby certify that service of the foregoing **MOTION FOR EXTENSION**
3 **TO FILE TO FILE APPELLANT'S OPENING BRIEF AND APPENDIX** was made on this 7th day
4 of August, 2014, by depositing a true and correct copy for the same by was served upon the parties by the
5 Court's designated electronic filing and service program and/or by placing an original or true copy thereof
6 in a sealed envelope, and depositing it in the U.S. Mail, postage prepaid, at Las Vegas, Nevada, addressed
7 as follows:

8
9 Richard A. Harris, Esq.
Alison Brasier, Esq.
10 Benjamin P. Cloward, Esq.
RICHARD HARRIS LAW FIRM
11 801 S. Fourth Street
Las Vegas, Nevada 89101
12 *Attorneys for Respondent*

13 
14 An Employee of
15 HALL JAFFE & CLAYTON, LLP
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