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IN THE SUPREME COURT OF THE STATE OF NEVADA

RAYMOND RIAD KHOURY,  
Appellant,

vs.

MARGARET SEASTRAND,  
Respondent.

Electronically Filed  
Oct 06 2014 02:13 p.m.  
Tracie K. Lindeman  
Clerk of Supreme Court  
Supreme Court No.: 64702  
Supreme Court No.: 65007  
Supreme Court No.: 65172

District Court Case No.: A636515

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

**[FOURTH REQUEST]**

Pursuant to NRAP 26(d) and 31(b)(3), Appellant requests an extension of an additional ten judicial days, up to and including October 20, 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 October 6, 2014. This is the fourth 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, and two prior motions were granted. The granting of the most recent motion moved the deadline by ten judicial days, from September 22, 2014 to October 6, 2014.

Unfortunately, the prior emergencies necessitating the previous extensions created a more significant logjam than originally anticipated. More specifically, the sudden departure of multiple key associates—one of whom was originally responsible for drafting a large portion of this appeal, lead appellate counsel Steve Jaffe's 6-week federal trial through August and September, and the untimely family emergencies of lead associate Jacob S. Smith all combined to create a backlog which resulted in the need for more time than was originally estimated. In short, while counsel was hopeful that the Opening Brief would be completed by the previous extension, retrospect has shown that more time should have been requested to allow sufficient finalize the Opening Brief.

1 Although the brief is substantially complete, additional time is needed to adequately  
2 address the important issues raise on appeal and finalize the brief. Accordingly, Appellant  
3 now makes that request, by seeking an additional ten (10) judicial days to complete the  
4 Brief. This request in good faith, and not for the purpose of harassment or delay.

5 DATED this \_\_\_\_ day of October, 2014.

6 HALL JAFFE & CLAYTON, LLP

7  
8 By /s/ Steven T. Jaffe  
9 STEVEN T. JAFFE, ESQ.  
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1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRAP 25, I hereby certify that service of the foregoing **MOTION FOR**  
3 **EXTENSION TO FILE APPELLANT'S OPENING BRIEF AND APPENDIX** was  
4 made on this 0 day of October, 2014, by depositing a true and correct copy fo the same by  
5 was served upon the parties by the Court's designated electronic filing and service program  
6 and/or by placing an original or true copy thereof in a sealed envelope, and depositing it in  
7 the U.S. Mail, postage prepaid, at Las Vegas, Nevada, addressed as follows:

8  
9 Richard A. Harris, Esq.  
Alison Brasier, Esq.  
Benjamin P. Cloward, Esq.  
10 RICHARD HARRIS LAW FIRM  
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12 *Attorneys for Respondent*

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An Employee of  
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