

RAYMOND RIAD KHOURY,
APPELLANT,
VS.
MARGARET SEASTRAND,
RESPONDENT.

65007

65172

Electoral College

Jan 13 2015 12:58 p.m.

Tracie K. Lindeman

Clerk of Supreme Court

Respondent, Margaret Seastrand, hereby moves the court to enter its order granting her a 30-day extension of time, to and including February 13, 2015, within which to file her answering brief. The brief was originally due on December 15, 2014, and, pursuant to a prior stipulation for a 30-day extension, is currently due on January 14, 2015. This motion is made pursuant to NRAP 31(b)(3) on the grounds that there exists good cause warranting such an extension. The motion is based on the accompanying memorandum of points and authorities and all matters of record.

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FACTS

Appellant was granted five (5) extensions of time within which to file

1 his opening brief and appendix. Having sought leave, and such leave having
2 been granted, appellant filed an opening brief in excess of the type-volume
3 limitations prescribed in NRAP 32(a)(7)(A)(ii). The undersigned firm has
4 been diligent in its preparing respondent's answering brief and, in fact, has
5 retained experienced appellate counsel to assist in its preparation. The work
6 has proceeded expeditiously and the answering brief and respondent's
7 appendix are nearing completion. However, due to the length of the opening
8 brief and the other commitments of the attorneys assigned to the task, a second
9 thirty-day extension, to and including February 13, 2015, will be required.

10 **ARGUMENT**

11 Pursuant to NRCP 31(b)(3)(B), this court may grant an extension of time
12 based upon a clear showing of good cause. It is respectfully submitted that
13 good cause has been clearly demonstrated and that the grant of a second
14 extension of time is both warranted and reasonable, especially in light of the
15 time granted to appellant to prepare his oversize opening brief.

16 **CONCLUSION**

17 For the foregoing reasons, Ms. Seastrand respectfully requests that the
18 court grant her motion and extend the time within which to prepare, file, and
19 serve her answering brief and respondent's appendix to February 13, 2015.

20 DATED this 13th day of January, 2015.

21 RICHARD HARRIS LAW FIRM
22

23 By s/ Benjamin P. Cloward
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CERTIFICATE OF ELECTRONIC SERVICE

Pursuant to Rule 9 of the Nevada Electronic Filing and Conversion Rules, the foregoing document was electronically filed in the Supreme Court of Nevada on this date, and will automatically be served on counsel for appellant by the court's electronic service system.

DATED this 13th day of January, 2015.

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