

1 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

2
3 RAYMOND RIAD KHOURY,
4 APPELLANT,
5 VS.
6 MARGARET SEASTRAND,
7 RESPONDENT.

Case Nos. 64702
65007
65172

(Electronically Filed)
Feb 13 2015 09:23 a.m.
Tracie K. Lindeman
Clerk of Supreme Court

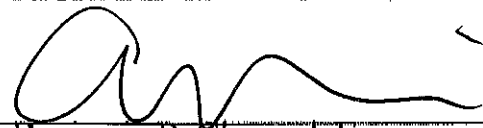
8 **MOTION FOR LEAVE TO FILE ANSWERING BRIEF**
9 **IN EXCESS OF PAGE AND TYPE-VOLUME LIMITATIONS**

10 Respondent, acting by and through her counsel, Benjamin Cloward, of the
11 Richard Harris Law Firm, hereby moves the Court to enter its order granting her
12 leave to file an opening brief that exceeds the page and type-volume limitations
13 prescribed by NRAP 32(a)(7)(A)(i) and (ii), to wit: a 54-page brief containing
14 18,560 words. This motion is made pursuant to NRAP 32(a)(7)(D) and is based
15 on the Declaration of Alison Brasier, Esq., annexed hereto as Exhibit 1.

16 DATED this 12th day of February, 2015.

17 RICHARD HARRIS LAW FIRM

18 By



19 Benjamin P. Cloward, Esq.
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21 Alison Brasier, Esq.
22 Nevada State Bar No. 10522
23 801 South Fourth Street
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25 Telephone: (702) 444-4444
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28 Attorneys for Respondent

29 **MEMORANDUM OF POINTS AND AUTHORITIES**

30 **FACTS**

31 Appellant was granted unopposed leave to file an opening brief in excess
32 of the page and type-volume limitations set forth in NRAP 32(a)(7)(A)(i) and
33 (ii). His opening brief raises nine issues, many of which are fact-intensive and

1 thus are highly dependent upon an exhaustive counter-explication of the events
2 at trial. Further, respondent's counsel has been diligent in editing the answering
3 brief. The assistance of experienced appellate counsel was enlisted and several
4 rounds of editing were undertaken, resulting in a reduction from nearly 20,000
5 words to the current number of 18,560, resulting in a reduction of almost 10%
6 of the number of words in the original draft. Block quotes were shortened or
7 eliminated.

8 The undersigned has concluded that further reduction in the content of
9 respondent's answering brief would undermine its strength and its helpfulness
10 to the Court. Finally, respondent will interpose no objection in the event
11 appellant feels compelled to seek leave to file an oversize reply brief.

12 ARGUMENT

13 NRAP 32(a)(7)(D) provides that a request to file a brief in excess of the
14 page and type-volume limits may be granted upon a showing of diligence and
15 good cause. Respondent respectfully submits that the facts set forth above
16 establish such diligence and good cause for her request to increase such
17 limitations. It is further submitted that respondent's answering brief, as
18 presently constituted, will be of assistance to the Court in its disposition of this
19 appeal.

20 CONCLUSION

21 For the foregoing reasons, respondent respectfully submits that the
22 foregoing motion should be granted.

23 DATED this 12th day of February, 2015.

24 RICHARD HARRIS LAW FIRM

25
26 By 

27 Akson Brasier, Esq.
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An Employee of Richard Harris Law Firm

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