Case Nos. 64702, 65007 and 65172

In the Supreme Court of Nevada

| RAYMOND RIAD KHOURY, | Apr 20 2015 02:16 p.m |
|----------------------|--|
| Appellant, vs. | Tracie K. Lindeman Clerk of Supreme Cour |
| MARGARET SEASTRAND, | |
| Respondent, | |

MOTION FOR EXTENSION TO FILE APPELLANT'S REPLY BRIEF

Appellant Raymond Riad Khoury requests 30 days, until May 20, 2015, to file his reply brief. NRAP 31(b)(3). The brief was originally due March 20, 2015 and is currently due April 20, 2015. This is the first motion for extension. (The parties previously stipulated to an extension pursuant to NRAP 31(b)(2).) No requests for extension have been denied or denied in part.

Additional time is needed. First, this is an important appeal, raising several issues of first impression. The over-sized length of respondent's answering brief reflects the number and significance of those issues. Appellant is working to ensure that the reply brief both thoroughly responds to the answering brief and apprises the Court of all authorities that might aid the Court in its resolution.

Second, appellant has had to move to strike portions of respondent's appendix and opening brief, due to the inclusion of papers that were never filed in the district

court. The reply brief should not be due before the scope of respondent's appendix and arguments in the answering brief are finally determined.

CONCLUSION

For the foregoing reasons, the Court should extend the time for appellant to file his reply brief by 30 days, or until May 20, 2015.

Dated this 20th day of April, 2015.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 20, 2015, I submitted the foregoing "MOTION FOR EXTENSION TO FILE APPELLANT'S REPLY BRIEF" for filing *via* the Court's eFlex electronic filing system. Electronic notification will be sent to the following:

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> /s/ Jessie M. Helm An Employee of Lewis Roca Rothgerber LLP