

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
May 27 2015 08:44 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, Alison Brasier, 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 53-page brief containing
14 18,293 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 26th day of May, 2015.

17 RICHARD HARRIS LAW FIRM

18 By s/ Alison Brasier
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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **FACTS**

3 Appellant was granted unopposed leave to file an opening brief in excess
4 of the page and type-volume limitations set forth in NRAP 32(a)(7)(A)(i) and
5 (ii). His opening brief raises nine issues, many of which are fact-intensive and
6 thus are highly dependent upon an exhaustive counter-explication of the events
7 at trial. Additionally, when respondent filed her original answering brief herein,
8 she moved for and was granted leave to file a brief containing more words than
9 the current version. Further, respondent's counsel has been diligent in editing
10 the answering brief. The assistance of experienced appellate counsel was
11 enlisted and several rounds of editing were undertaken, resulting in a reduction
12 from nearly 20,000 words to the current number of 18,293, resulting in a
13 reduction of almost 10% of the number of words in the original draft. Block
14 quotes were shortened or eliminated.

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

19 **ARGUMENT**

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

27 **CONCLUSION**

28 For the foregoing reasons, respondent respectfully submits that the

1 foregoing motion should be granted.

2 DATED this 26th day of May, 2015.

3 RICHARD HARRIS LAW FIRM

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5 By s/ Alison Brasier
6 Alison Brasier, Esq.
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