

In the Supreme Court of Nevada

RAYMOND RIAD KHOURY,
Appellant,
vs.
MARGARET SEASTRAND,
Respondent,

Electronically Filed
Aug 28 2015 03:46 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

MOTION FOR EXTENSION TO FILE APPELLANT'S REPLY BRIEF

Appellant Raymond Khoury requests two weeks, until September 11, 2015, to file his reply brief. NRAP 31(b)(3). The brief was originally due June 29, 2015 and is currently due August 28, 2015. This is Khoury's third request for extension after receiving the current answering brief, and second by motion.¹ The Court has not denied any extension requests in whole or in part.

While the brief is nearly complete, Khoury requests an additional, short extension of time due to a confluence of unusual circumstances. Khoury's appellate counsel has had to divert time toward preparing for oral argument in *Corporation of the Presiding Bishop of the Church of Jesus Christ of Latter-Day Saints v. Seventh Judicial District Court*,

¹ After the current answering brief was filed, the parties stipulated to one extension pursuant to NRAP 31(b)(2).

Case No. 65424. Preparing for that argument of state-wide importance has been consuming, not only because of the massive record, but also because counsel unexpectedly discovered and had to apprise the Court of the legislative history for the principal statute in that case.

Dated this 28th day of August, 2015.

LEWIS ROCA ROTHGERBER LLP

By: /s/ Joel D. Henriod

DANIEL F. POLSENBERG (SBN 2376)
JOEL D. HENRIOD (SBN 8492)
3993 Howard Hughes Parkway, Suite 600
Las Vegas, Nevada 89169
(702) 949-8200

STEVEN T. JAFFE (SBN 7035)
HALL, JAFFE & CLAYTON, LLP
7425 Peak Drive
Las Vegas, Nevada 89128
(702) 316-4111

Attorneys for Appellant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 28, 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:

Richard A. Harris
Benjamin A. Cloward
Alison M. Brasier
RICHARD HARRIS LAW FIRM
801 South Fourth Street
Las Vegas, Nevada 89101

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