

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

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3 CAREY HUMPHRIES; AND
4 LORENZO ROCHA, III,
5 Appellants,

6 vs.
7 NEW YORK-NEW YORK HOTEL &
8 CASINO,
9 Respondent.

Electronically Filed
Dec 12 2017 02:47 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

S.C. CASE NO. 65316

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12 **APPELLANTS' MOTION TO EXTEND TIME TO RESPOND TO**
13 **RESPONDENT'S PETITION FOR REHEARING**

14
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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 Pursuant to NRAP 26(b)(1)(A) and 27, Appellants request that they be given
3 additional time to respond to Respondent's Petition for Rehearing. Good cause
4 exists for the Appellants to have time to file an Answer to Respondent's Petition
5 for Rehearing.
6

7 Appellants require additional time to respond to Respondent's motion as
8 lead counsel for appellants has a small law practice with himself and an associate.
9 That as of November and early December, 2017, counsel has been preparing for
10 two Federal criminal trials that were set to occur in early and mid-December,
11 respectively. That such has taken a considerable amount of time and caused both
12 the attorney and staff to focus heavily on trial preparation. Further, that during the
13 month of December, key members of the staff of the attorney for Appellants have
14 taken holiday leave and as such the office is currently short-handed.
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16 That attorney for the appellants, Craig W. Drummond, Esq., has been
17 diligently preparing for a multi-defendant Federal criminal trial in the matter of
18 United States v. Lloyd, 2:15-cr-00266-LDG-VCF, set for trial on December 18,
19 2017. It was not until December 8, 2017 that the trial was continued by the
20 Federal District Judge.
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22 That attorney for the appellants, Craig W. Drummond, Esq., has been
23 diligently preparing for another criminal trial in the matter of United States v.
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1 Fesolai, 2:17:cr-00074-JCM-NJK, set for trial on December 4, 2017. That in late
2 November a stipulation to continue the trial was signed and it was not until early
3 December that the trial was formally continued by the Federal District Judge, all
4 the while counsel was preparing for a possible trial.
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6 That counsel for Appellants is asking for an additional fifteen (15) days to
7 file a responsive pleading in this matter. That this time is needed to fully review
8 the issues of law in this case and respond. The Respondent has recently hired
9 additional counsel on appeal and filed a large pleading outlining a number of legal
10 issues, claiming that the decision of the Supreme Court was wrong, and arguing
11 that this issue is of extreme importance to the entire business industry of Nevada.
12 Such claims must be addressed and a brief extension of time is needed to
13 competently research the issues and respond.
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DATED this 14 of December, 2017

Respectfully Submitted,

~~DRUMMOND LAW FIRM, P.C.~~

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