## IN THE SUPREME COURT OF THE STATE OF NEVADA

IN THE MATTER OF: THE GUARDIANSHIP OF THE PERSON AND ESTATE OF JEAN RUTH ECHEVARRIA, AN ADULT WARD,

MICHAEL A. ECHEVARRIA, Appellant,

VS.

ROBERT L. ANSARA; AND ANGEL ECHEVARRIA,

Respondents.

Electronically Filed Nov 17 2015 11:39 a.m. Tracie K. Lindeman Clerk of Supreme Court

Case No.: 65598

(Eighth Judicial District Court Case No. G027262)

## <u>APPELLANT'S MOTION TO EXTEND TIME TO FILE A REPLY BRIEF</u> <u>AND TO REJECT PENDING REPLY BRIEF</u>

COMES NOW Appellant Michael A. Echevarria, by and through his attorney, Karen K. Wong, and moves for an extension of time in which to file a reply brief in this case. Appellant requests that the Court grant Appellant thirty (30) days from the time of this Court's ruling on the instant motion to file the reply brief. In the event the Court grants Appellant's instant motion for an extension of time, Appellant additionally requests that the currently pending reply brief submitted by Appellant's prior counsel be rejected for filing.

The reply brief in this case was originally due on August 13, 2015, and Appellant's prior counsel, Beau Sterling, requested an extension of time up to September 14, 2015, to file it. On September 18, 2015, Mr. Sterling was ordered to appear before the Court to show cause why additional sanctions should not be imposed for his conduct in the instant case as well as other cases before the Court. The Court's docket reflects that a reply brief was received on September 21, 2015; that reply brief is pending and has not been filed.

As it appears from the docket that Mr. Sterling no longer is able to represent Appellant and was unable to submit a timely reply brief, and as Appellant has legitimate doubts as to the sufficiency of the reply brief submitted by Mr. Sterling, Appellant now requests that the undersigned counsel be given thirty (30) days from the time of this Court's order, to review the record and submit a new reply brief.

Dated this 17th day of November, 2015.

/s/ Karen K. Wong

Karen K. Wong Nevada Bar No. 13284 Wong Appellate Law 9484 S. Eastern Ave., #408 Las Vegas, NV 89123 Phone: (702) 830-6080 *Attorney for Appellant* 

## **CERTIFICATE OF SERVICE**

I hereby certify that this document was filed electronically with the Nevada Supreme Court on November 17, 2015. Electronic service of the foregoing document shall be made, in accordance with the service list, upon the following counsel of record:

Mark A. Solomon Elyse M. Tyrell

/s/ Karen K. Wong

Karen K. Wong Wong Appellate Law