

1 IN THE SUPREME COURT OF THE STATE OF NEVADA

2 * * * * *

3 KIRK ROSS HARRISON,

4 Appellant/Cross-
Respondent,

5 vs.

6 VIVIAN MARIE LEE HARRISON,

7 Respondent/Cross-
8 Appellant.
9 _____/

Electronically Filed
Jun 05 2015 02:43 p.m.
Tracie K. Lindeman
Clerk of Supreme Court
NO. 66072

10 **MOTION FOR EXTENSION OF TIME FOR FILING OPENING BRIEF**

11 **(SECOND REQUEST)**

12 Appellant/Cross-Respondent KIRK HARRISON hereby moves for a 30-day extension
13 of time for the opening brief. This is the second requested extension for the opening brief. The
14 brief is presently due on June 8, 2015. Therefore, appellant requests an extension until July 8,
15 2015.

16 As indicated in appellant's previous motion for an extension, this appeal docket involves
17 an order awarding attorneys' fees. Docket number 66157 is a separate but related appeal
18 involving child custody issues. After an extension of time for respondent's fast track response
19 in the child custody appeal, respondent filed her fast track response on May 6, 2013. Upon
20 receiving the response, appellant and his counsel commenced preparation of a fast track reply,
21 together with a motion seeking permission to file the reply. In addition to spending time on the
22 motion and the proposed fast track reply in the child custody appeal, appellant and his counsel
23 have been working on the opening brief and the appendix in this attorneys' fees appeal.

24 The issues on appeal in this docket are unusual and complex. The district court's order
25 awarded attorneys' fees against appellant in the amount of approximately \$91,000. The district
26 court's order was 27 pages in length, with an exhaustive discussion of the various factors and
27 issues leading to the district court's award. The appendix will be comprehensive. Appellant
28 and his counsel are analyzing the record and preparing the opening brief and appendix, but they

1 have been unable to complete the brief within the present deadline.

2 Accordingly, we request a second 30-day extension of time for the opening brief, with
3 a new due date of July 8, 2015. This motion is being submitted in good faith, and without the
4 intent to cause undue delay in the appeal. We do not anticipate that any further extensions will
5 be necessary.

6 DATED: June 5, 2015

8 LEMONS, GRUNDY & EISENBERG

9 By: Robert L. Eisenberg
10 ROBERT L. EISENBERG
11 6005 Plumas Street, Third Floor
12 Reno, Nevada 89509
13 775-786-6868
14 rle@lge.net

15 *ATTORNEYS FOR APPELLANT/
16 CROSS-RESPONDENT*

1 CERTIFICATE OF SERVICE

2 I certify that I am an employee of Lemons, Grundy & Eisenberg and that on this date the
3 foregoing was filed electronically with the Clerk of the Nevada Supreme Court, and therefore
4 electronic service was made in accordance with the master service list as follows:

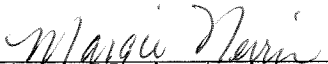
5 Edward L. Kainen
6 Thomas J. Standish
7 Radford J. Smith
8 Gary R. Silverman
9 Mary Anne Decaria

10 I further certify that on this date I served a copy of this notice, postage prepaid, by U.S.
11 Mail to:

12 Kirk Harrison
13 1535 Sherri Lane
14 Boulder City, Nevada 89005

15 Settlement Judge Lansford Levitt
16 4747 Caughlin Parkway
17 Suite 6
18 Reno, Nevada 89519

19 DATED: June 5, 2015

20 
21 Margie Nevin, Assistant to
22 ROBERT L. EISENBERG
23
24
25
26
27
28