

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
Nov 17 2015 11:43 a.m.
Tracie K. Lindeman
Clerk of Supreme Court

NO. 66072

10 **MOTION FOR EXTENSION OF TIME FOR FILING REPLY BRIEF ON APPEAL,**
11 **COMBINED WITH ANSWERING BRIEF ON CROSS-APPEAL**

12 Appellant/cross-respondent Kirk Harrison hereby moves for a 30-day extension of time
13 to file the combined reply brief on appeal and answering brief on cross-appeal. This is the
14 second requested extension for the reply brief and answering brief. The combined brief is
15 presently due on December 7, 2015. Therefore, appellant/cross-respondent requests an
16 extension until January 6, 2016.

17 This Court recently set oral argument in the custody appeal in this matter (No. 66157)
18 for December 8, 2015. Kirk and counsel Eisenberg will be preparing for this argument.
19 However, counsel Eisenberg will be traveling out of town for the Thanksgiving holiday during
20 most of the week of November 23, 2015, and he will also be leaving on December 1, 2015 to
21 attend an argument at the United States Supreme Court and will be in Washington D.C. for one
22 week. Kirk has a hearing and depositions out of state on November 23 & 24, 2015 and will also
23 be traveling out of town for the Thanksgiving holiday. As noted in the prior request, significant
24 custody motions in this case are going to be heard by the trial court on December 14, 2015.
25 Additionally, the issues on appeal in this docket are unusual and complex. Kirk Harrison and
26 his counsel are unable to complete the brief within the present deadline.

27 Accordingly, we request a 30-day extension of time for the reply/answering brief, with
28 a new due date of January 6, 2016.

1 This motion is being submitted in good faith, and without the intent to cause undue delay
2 in the appeal.

3 DATED: Nov. 17, 2015
4

5 LEMONS, GRUNDY & EISENBERG

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12 ATTORNEYS FOR APPELLANT/
13 CROSS-RESPONDENT KIRK HARRISON
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CERTIFICATE OF SERVICE

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

Edward L. Kainen
Thomas J. Standish
Radford J. Smith
Gary R. Silverman
Mary Anne Decaria

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

Kirk Harrison
1535 Sherri Lane
Boulder City, Nevada 89005

DATED: 11/17/15

Julie Shapiro