

Electronically Filed  
Feb 11 2016 04:15 p.m.  
Tracie K. Lindeman  
Clerk of Supreme Court  
60072

Supreme Court No. 60072  
District Court Case No. **D-11-443611-D**

V.

Respondent/Cross-Appellant.

Pursuant to NRAP 26, Respondent/ Cross-Appellant, Vivian Marie Lee Harrison (“Vivian”) hereby moves for a thirty (30) day extension of time for filing the Reply Brief. This is the second requested extension for the Reply Brief. The Reply Brief is presently due for February 16, 2016. Should the request be granted, the Reply Brief will be due on March 17, 2016.

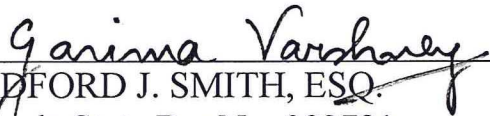
The issues raised in Appellant/Cross-Respondent, Kirk Harrison's Reply Brief are unusual, complex and highly contentious. On November 17, Kirk filed a Motion for Extension of Time to file his Reply brief which Motion was granted. Kirk has now raised new, unusual, complex and highly contentious issues in his Reply that must be addressed. Vivian's counsel are unable to complete the Reply brief within the present deadline.

1 Vivian's counsel, Radford J. Smith, Chartered recently lost an associate and another  
2 associate has taken leave to prepare and appear for the Nevada State Bar examination in  
3 February. Mr. Smith had to travel extensively to California and New York for depositions  
4 in a highly contentious case and complex litigation case, the trial for which case is  
5 currently scheduled for the second week of February. Mr. Smith will be engaged in a three  
6 day trial and will be traveling out of Las Vegas for another hearing. Vivian's counsel,  
7 Radford J. Smith, Chartered recently lost an associate and another associate has taken leave  
8 to prepare and appear for the Nevada State Bar examination in February.  
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12 For the reasons set forth herein, Cross-Appellant requests a thirty (30) day extension  
13 until March 17, 2016 for filing the Reply Brief. This motion is being submitted in good  
14 faith, and without the intent to cause undue delay in the appeal.  
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16 Dated this <sup>th</sup> 11 day of February, 2016.  
17

18 RADFORD J. SMITH, CHARTERED  
19

20   
21 RADFORD J. SMITH, ESQ.  
22 Nevada State Bar No. 002791  
23 GARIMA VARSHNEY, ESQ.  
24 Nevada State Bar No. 011878  
25 2470 St. Rose Parkway, Suite 206  
26 Henderson, Nevada 89074  
27 Respondent/Cross-Appellant  
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**CERTIFICATE OF SERVICE**

I certify that on the 11<sup>th</sup> day of February, 2016, I served a copy of this Motion for Extension of Time to File Reply Brief upon all counsel of record by electronic service:

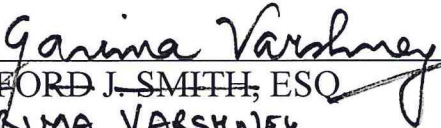
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DATED this 11<sup>th</sup> day of February, 2016.

  
~~RAEFORD J. SMITH, ESQ~~  
GARIMA VARSHNEY