TAMI D. COWDEN, ESQ. Nevada Bar No. 8994 GREENBERG TRAURIG, LLP 3773 Howard Hughes Parkway, Suite 400 North Las Vegas, Nevada 89169 Electronically Filed Telephone: (702) 792-3773 Jul 14 2015 08:17 a.m. Facsimile: (702) 792-9002 Tracie K. Lindeman Email: cowdent@gtlaw.com Clerk of Supreme Court Attorneys for Appellant Wesley Lewis 5 SUPREME COURT 6 OF THE STATE OF NEVADA 7 Wesley Allen Lewis, CASE NO. 66497 Appellant, 8 MOTION FOR EXTENSION OF 9 TIME TO FILE OPENING BRIEF Maria Daniela Lewis, 10 Respondent. 11 12 13 Pursuant to Rule 31(b)(3) of the Nevada Rules of Appellate Procedure, Appellant Wesley Lewis, by and through counsel, Tami D. 14 Cowden, Esq., of the law firm of Greenberg Traurig, LLP, hereby requests 15 that the Court extend the time for filing his Opening Brief Reply Brief 23 16 days, to August 6, 2015. 17 1. Appellant's Opening Brief is currently due July 14, 2015. Thus, 18 Appellant is making this Motion prior to the due date for his Reply Brief and 19 is in compliance with NRAP 31(b)(3). 20 Appellant has previously received one 5-day extension of time 2. to file the Opening Brief which extension was requested via telephone 21 pursuant to NRAP 26(b)(1)(B). The original due date of the Opening Brief 22

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was July 7, 2015. No other request for extension of time to file the Opening Brief has been made.

- 3. This request is made because several other legal matters have, for the weeks arisen the weeks immediately prior and after to both the original and extended due dates for the Opening Brief, have developed issues requiring urgent attention. In addition to the matters whose urgent deadline fell within the last two weeks, remaining remaining competing matters include oppositions to summary judgment motions requiring review of tens of thousands of pages of disclosed documents, as well as unanticipated, late-filed evidentiary and discovery motions for a matter to be tried in the Eastern District of Louisiana in August.
- 4. In addition, the undersigned and her husband have a planned and paid for vacation scheduled for July 18-25.
- The requested extension will permit Appellant's counsel to 5. devote the needed attention to the Opening Brief for this matter, while also allowing for the appropriate attention to the competing matters as well as the avoidance of marital strife.
- 6. If the request is granted, the due date for the Reply Brief would be August 6, 2015, 30 days after the original due date, and thus, the total length of extensions granted, including the previously granted 5 (judicial) day extension, will be 30 days.

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GREENBERG TRAURIG, LL	3773 Howard Hughes Parkway	

Wherefore, for the reasons stated above, Appellant respectfully requests the Court grant this Motion for Extension of Time to File the Opening Brief, to and including August 6, 2015.

Respectfully submitted this 13<sup>th</sup> day of July 2015.

## **GREENBERG TRAURIG, LLP**

## /s/ Tami D. Cowden

Tami D. Cowden, Esq. Nevada Bar No. 8994 3773 Howard Hughes Parkway, 400 N Las Vegas, Nevada 89169 Attorney for Appellant Wesley Lewis

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## GREENBERG TRAURIG, LLP 3773 Howard Hughes Parkway

<b>CERTIFICATE</b>	<b>OF</b>	<b>SERVICE</b>
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## MOTION FOR EXTENSION OF DEADLINE TO FILE OPENING

BRIEF upon:

Frances-Ann Fine, Esq.
The Fine & Price Law Group
8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
Attorneys for Plaintiff

by causing a full, true, and correct copy thereof to be sent via electronic mail through this Court's e-filing system, and regular U.S. Mail.

/s/ Andrea Lee Rosehill
AN EMPLOYEE OF
GREENBERG TRAURIG, LLP