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Tracie K. Lindeman
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**SUPREME COURT
OF THE STATE OF NEVADA**

Wesley Allen Lewis,

Appellant,

v.

Maria Daniela Lewis,

Respondent.

CASE NO. 66497

**MOTION FOR EXTENSION
OF TIME TO FILE
OPENING BRIEF**

Pursuant to Rule 31(b)(3) of the Nevada Rules of Appellate Procedure, Appellant Wesley Lewis, by and through counsel, Tami D. Cowden, Esq., of the law firm of Greenberg Traurig, LLP, hereby requests that the Court extend the time for filing his Opening Brief for 29 days, to September 4, 2015.

1. Appellant's Opening Brief is currently due August 6, 2015. Appellant is making this Motion prior to the expiration of the deadline for the Opening Brief and is in compliance with NRAP 31(b)(3).

2. Appellant has previously received one 5-day extension of time to file the Opening Brief which extension was requested via telephone pursuant to NRAP 26(b)(1)(B), and a second extension, for a total of 25

1 calendar days was requested. The original due date of the Opening Brief
2 was July 7, 2015. No other request for extension of time to file the Opening
3 Brief has been made.

4 3. This request is made because two of the other legal matters
5 mentioned in the prior request have increased in terms of the needed
6 attention.

7 4. That situation has been exacerbated due to the recent departure
8 and leave of absence of several associate attorneys within the firm, and there
9 is a decreased ability to shift work. Shifting the present matter is not
10 possible because of the pro bono representation. And, in both of the two
11 matters mentioned previously, one of which is a federal trial scheduled to
12 begin in Louisiana in less than three weeks, due to the staff losses, the
13 undersigned and lead trial attorney are the only attorneys in the firm with
14 sufficient familiarity with the facts, issues, and thousands of pages of
15 exhibits to perform the needed briefing and trial preparation. Additionally,
16 the undersigned notes while the vacation referenced in the prior request did
17 occur, the undersigned did end up spending vacation time working in the
18 firm's New York office due to the demands of the cases referenced above.

19 5. The undersigned is very conscious of the pressing nature to the
20 issues within this domestic appeal to both parties, and regrets the need to
21 request additional time.

22 6. Nevertheless, to ensure that the brief in this matter herein
23 receives proper attention, the undersigned must request an additional 29 days
24 in which to complete the brief.

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, September 4, 2015.

Respectfully submitted this 6th day of August, 2015.

GREENBERG TRAURIG, LLP

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