

1 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

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3 WESLEY ALLEN LEWIS,)

4 Appellant;)

5 vs.)

6 MARIA DANIELA LEWIS,)

7 Respondent.)

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Oct 09 2015 01:38 p.m.
Tara K. Lindeman
Clerk of Supreme Court
Supreme Court No. 6417
District Court No. 15-10-427064-D

9 **MOTION FOR AN EXTENSION OF TIME TO FILE ANSWERING**
10 **BRIEF**

11 Pursuant to Rule 31(b)(3) of the Nevada Rules Of Appellate
12 Procedure, Respondent MARIA DANIELA LEWIS, by and through her
13 counsel, FRANCES-ANN FINE, ESQ., of The Fine & Price Law Group,
14 hereby requests that the Court extend the time for filing her Answering Brief
15 for 30 days, to November 11, 2015.

16 1. Respondent's Answering Brief is currently due October
17 12, 2015. Respondent is making this motion prior to the expiration of the
18 deadline for the Answering Brief and is in compliance with NRAP 31(b)(3).

19 2. Respondent has made no other request for extension of
20 time to file the Answering Brief.

21 3. This request is made because since the filing of the
22 Opening Brief the undersigned counsel has been unable to devote the needed

1 attention to the Answering Brief due to intervening religious holidays, a
2 previously scheduled and paid for trip for several days outside the State of
3 Nevada, and several other cases with deadlines and hearings that required
4 counsel's attention including the filing of an Answering Brief in another
5 matter before this Court.

6 4. This requested extension will not prejudice Appellant
7 herein. It is noted that Appellant's Opening Brief was originally due on July
8 7, 2015. Appellant's counsel sought via one telephonic request and via three
9 separate written motions extensions of time to file the Opening Brief. These
10 requests were granted by this Court, culminating in the filing of Appellant's
11 Opening Brief on September 10, 2015.

12 5. The requested extension will permit Respondent's
13 counsel to devote the needed attention to the Answering Brief as well to the
14 likely necessity to file a Respondent's Appendix, while still attending to
15 other litigation in the undersigned counsel's two-attorney law firm.

16 6. If the request is granted, the due date for the Answering
17 Brief will be November 11, 2015.

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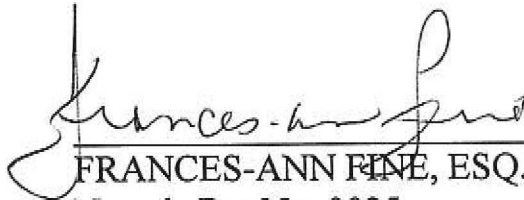
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1 WHEREFORE, for the reasons stated above, Respondent
2 respectfully requests the Court grant this Motion For Extension Of Time To
3 File Answering to and including November 11, 2015.

4 DATED this 9th day of October, 2015.

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FRANCES-ANN FINE, ESQ.
7 Nevada Bar No. 0025
THE FINE & PRICE LAW GROUP
8 8975 South Pecos Road, Ste. 5
Henderson, Nevada 89074
9 Attorney for Respondent
MARIA DANIELA LEWIS

10 **CERTIFICATE OF ELECTRONIC SERVICE AND MAILING**

11 THIS IS TO CERTIFY that on the 9th day of October, 2015, a
12 copy of the foregoing MOTION FOR EXTENSION OF TIME TO FILE
13 ANSWERING BRIEF was sent via electronic service through this Court's e-
14 filing system and in a sealed envelope via U.S. Mail, postage fully prepaid,
15 to the following:

16 Tami D. Cowden Esq.
17 Greenberg Traurig, LLP
Suite 400 North
18 3773 Howard Hughes Parkway
Las Vegas, Nevada 89169
19 Attorney for Appellant

20 
An Employee of The Fine & Price Law Group
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