LAW FIRM OF TELIA U. WILLIAMS Telia U. Williams, Esq. Nevada Bar No. 9359 10161 Park Run Drive, Suite 150 Las Vegas, NV 89145 (702) 835-6866 teliauwilliams@telialaw.com *Attorney for Appellant* 

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## IN THE SUPREME COURT OF THE STATE OF NEVADA

KEVIN DANIEL ADRIANZEN,

No.: 66565

Plaintiff,

vs.

PAIGE ELIZABETH PETIT,

Defendant.

## MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF SECOND REQUEST

Appellant, by and through her undersigned counsel, Telia U Williams, Esq., of the Law Office of Telia U. Williams Esq., hereby moves this Honorable Court, pursuant to NRAP 26(b), for an extension of time of twenty-one (21) days, up to and including February 22, 2016, in which to file Appellant's Reply Brief in the above-captioned matter.

This Motion is made on the grounds that appellant's counsel, a solo practitioner, has shortly ago returned from bereavement leave for the passing of her mother, for whom she was the primary caretaker, and is serving as trustee of the Estate, is also serving as a *pro tempore* judge in Justice Court, Clark County, and has not had sufficient opportunity to get back up to speed with all of her cases, including this one. Considering the potential import of this case in Nevada, as it appears to be one of first impression, counsel needs additional time to adequately address issues raised by the appellee.

This is a second request for an extension because a telephonic request under Rule 26(b) (1) (B) was made and granted on January 25, 2016. The Appellant's reply brief was originally

due on January 25, 2016. The first request extended the time to February 1, 2016.

Accordingly, Appellant requests a twenty-one (21) day extension until February 22,

2016, for filing the Reply Brief.

DATED this 1<sup>st</sup> day of February, 2016.

<u>/s/ Telia U. Williams, Esq.</u> Law Office of Telia U. Williams Telia U. Williams, Esq. Nevada Bar No. 9359 10161 Park Run Drive, Suite Las Vegas, NV 89145

## **CERTIFICATE OF SERVICE**

Pursuant to the Nevada Rules of Civil Procedure, I certify that I am an employee of the Law Office of Telia U. Williams and that on this 1<sup>st</sup> day of February, 2016, I caused a true and correct copy of the above and foregoing Motion For Extension Of Time To File Reply Brief, Second Request to be served through the WIZNET e-filing system in accordance with the mandatory electronic service requirements of Administrative Order 14-2, and the Nevada Electronic Filing and Conversion Rules of the Eighth Judicial District Court, Nevada (or, if necessary, by United States Mail, first class, postage prepaid), to the following:

Bruce I. Shapiro, Esq. Pecos Law Group South Pecos Road, Suite 14A Henderson, Nevada 89074 <u>Email@pecoslawgroup.com</u> Attorneys for Respondent

\_/s/ David DaSilva\_\_

Employee of Law Office of Telia U. Williams