

IN THE SUPREME COURT OF THE STATE OF NEVADA

Page Elizabeth Petit,

Appellant,

vs.

Kevin Daniel Adrianzen,

Respondent.

Electronically Filed
Mar 29 2016 04:04 p.m.
Tracie K. Lindeman

Supreme Court No. ~~66565~~ Supreme Court
District Court No. **D-13-489540-N**
(Consolidated with D-13-489542-D)

**MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S
REPLY TO OPPOSITION TO RESPONDENT'S MOTION TO CORRECT
AND SUPPLEMENT RECORD**

Respondent **Kevin Daniel Adrianzen**, by and through his attorney, **Bruce I. Shapiro, Esq.**, of the law office of Pecos Law Group, respectfully submits this Motion for Extension of Time to File his Reply to Opposition to Respondent's Motion to Correct and Supplement Record.

MEMORANDUM OF POINTS AND AUTHORITIES

This appeal arises from a final Decree of Divorce in which the district court changed the name of an infant child from the mother's surname to a hyphenated surname containing the namesakes of both the father and the mother. The Appellant mother has appealed the district court's ruling.

On March 7, 2016, Respondent filed a Motion to Correct and Supplement Record. On March 24, 2016, Appellant filed her opposition to the motion. According to NRAP 27(a)(4), Respondent's reply to the opposition is due March 31, 2016. Given arguments raised in the opposition, a reply to the opposition requires counsel to conduct additional consultation and investigation with Respondent which may require more than the 5 court days provided by NRAP 26.

While counsel intends to file Respondent's reply on or before March 31, 2016, Respondent, in an abundance of caution, respectfully requests that he be granted an additional 5 calendar days in which to file his reply.

DATED this 27 day of March, 2016.

PECOS LAW GROUP



Bruce I. Shapiro, Esq.

Nevada Bar No. 004050

PECOS LAW GROUP

8925 South Pecos Road, Suite 14A

Henderson, Nevada 89074

(702) 388-1851

Attorney for Respondent

AFFIDAVIT OF BRUCE I. SHAPIRO, ESQ.

STATE OF NEVADA)
 : ss.
COUNTY OF CLARK)

BRUCE I. SHAPIRO, ESQ., first being duly sworn, deposes and says:

1. That he is an attorney licensed to practice in the state of Nevada and attorney for Respondent in the above-referenced action; that by virtue of that fact, he has personal knowledge of the matters contained herein and is competent to testify to the same;

2. That Affiant makes this affidavit in support of the foregoing "Motion for Extension of Time to File Respondent's Reply to Opposition to Respondent's Motion to Correct and Supplement Record;"


3. That Affiant has read the said Motion and hereby certifies that the facts set forth in the Points and Authorities attached thereto are true, and Affiant believes them to be true. Affiant incorporates these facts into this Affidavit as though full set forth herein.

4. Affiant further attests that this motion is made in good faith and not to delay justice.



BRUCE I. SHAPIRO, ESQ.

SUBSCRIBED and SWORN before
me this 29th day of March, 2016.



NOTARY PUBLIC

