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Tracie K. Lindeman  
Clerk of Supreme Court

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

JERALD R. JACKSON, TRUSTEE OF THE	)	<b>Supreme Court No. 67289</b>
JERALD R. JACKSON 1975 TRUST, AS	)	District Court No. 08-CV-0363-E
AMENDED; AND IRENE M. WINDHOLZ,	)	
TRUSTEE OF THE IRENE M. WINDHOLZ	)	
TRUST DATED AUGUST 11, 1992,	)	
	)	
Appellants,	)	
	)	
vs.	)	
	)	
THE STATE OF NEVADA STATE	)	
ENGINEER; EDWARD H. GROENENDYKE,	)	
TRUSTEE OF THE GROENENDYKE	)	
FAMILY TRUST,	)	
	)	
Respondents.	)	

**MOTION FOR EXTENSION OF TIME  
TO FILE APPELLANTS' OPENING BRIEF AND RELATED APPENDIX**

1 Pursuant to Nev. R. App. P., Rule 31(b)(3), Appellants Jerald R. Jackson, Trustee of the  
2 Jerald R. Jackson 1975 Trust, as amended, and Irene M. Windholz, Trustee of the Windholz  
3 Trust dated August 11, 1992, move the Court for an order extending the time for filing  
4 Appellants' Opening Brief and related Appendix by thirty (30) days, or to May 13, 2015. In  
5 support of this Motion, the undersigned counsel represents the following to the Court:  
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7 1. Appellants' Opening Brief and related Appendix are due in this matter on April  
8 13, 2015.

9 2. There have been no previous extensions of time granted.

10 3. There have been no previous requests for extensions of time which have been  
11 denied or denied in part.

12 4. An extension is necessary because counsel responsible for preparing the  
13 Appellants' Opening Brief and related Appendix in this matter has two other matters, in the  
14 United States District Court for the District of Nevada, involving argument and briefing, one a  
15 week before the due date for Appellants' Opening Brief, another a week after that due date, and  
16 argument related to the last brief on May 4, 2014. Counsel is also involved in other matters  
17 related to the continuing drought, and in matters related to water before the Nevada legislature.  
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19 5. The extension requested is thirty (30) days, and the Brief and related Appendix  
20 would be due on May 13, 2015.  
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22 6. Counsel for the State of Nevada State Engineer does not oppose this Motion.

23 7. Trial counsel for Edward H. Groenendyke, Trustee of the Groenendyke Family  
24 Trust, T. Scott Brooke, passed away in late December of 2014. At this point, the undersigned  
25 counsel does not know who will represent Edward H. Groenendyke, Trustee of the Groenendyke  
26 Family Trust, in this matter. Mr. Charles S. Zumpft of Brooke Shaw Zumpft believes that that  
27 counsel may be Severin A. Carlson of Kaempfer Crowell, 50 West Liberty Street, Suite 700,  
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1 Reno, Nevada 89501. A call to Mr. Carlson revealed that he is presently out of his office until  
2 Monday, April 6, 2015. Although the undersigned has explored the feasibility and potential  
3 content of a Joint Appendix with counsel for the State of Nevada State Engineer, that cannot take  
4 place with the other Respondent until his counsel is determined.

5 Therefore, Appellants respectfully request that the Court grant this Motion, and extend  
6 the time to file Appellants' Opening Brief and related Appendix to and including May 13, 2014.  
7

8 DATED: April 2, 2015

WOODBURN AND WEDGE  
6100 Neil Road, Suite 500  
Reno, Nevada 89511

10  
11 By: Gordon H. DePaoli  
12 Gordon H. DePaoli, NSB 195  
13 *Attorneys for Appellants Jerald R. Jackson,*  
14 *Trustee of the Jerald R. Jackson 1975 Trust,*  
15 *as amended, and Irene M. Windholz, Trustee*  
16 *of the Windholz Trust dated August 11, 1992*  
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I am an employee of Woodburn and Wedge and that on the 2nd day  
3 of April, 2015, I electronically filed the foregoing with the Clerk of the Court using the Supreme  
4 Court of Nevada Electronic Filing system, which will send notification of such filing to parties of  
5 record via their email addresses.  
6

7 I further certify that on the 2nd day of April, 2015, I deposited in the United States Mail,  
8 postage prepaid, a true and correct copy of the foregoing in an envelope addressed to:

9 Bryan Stockton  
10 Sr. Deputy Attorney General  
11 100 N. Carson Street  
12 Carson City, Nevada 89701-4717

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Brooke, Shaw, Zumpft  
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13 Severin A. Carlson  
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15 50 W. Liberty Street, Suite 700  
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18 Holly Dewar  
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