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IN THE SUPREME COURT OF THE STATE OF NEVADA

Electronically Filed
Aug 27 2015 03:12 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

JERALD R. JACKSON, TRUSTEE OF)	Supreme Court No. 67289
THE JERALD R. JACKSON 1975)	District Court No. 08-CV-0363-E
TRUST, AS 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 PERMISSION TO FILE REPLY BRIEF
ONE DAY LATE**

1 Appellants Jerald R. Jackson, Trustee of the Jerald R. Jackson 1975 Trust, as
2 amended, and Irene M. Windholz, Trustee of the Windholz Trust dated August 11,
3 1992, move the Court for an order allowing the filing of Appellants' Reply Brief,
4 which is attached hereto, one day late, or on August 27, 2015.

6 In support of this motion, counsel represents the following to the Court:

8 1. On July 13, 2015, counsel stipulated to allow Respondent State
9 Engineer until Monday, July 27, 2015 to file an answering brief in this matter.

11 2. On July 13, 2015, the Court entered an Order granting motions, which
12 Order stated that "Appellants shall have 30 days from service of the last filed
13 answering brief to file and serve a single reply brief, if deemed necessary."

15 3. When calculating the time for filing Appellants' Reply Brief, counsel
16 looked only at the Certificate of Service on the State Engineer's Answering Brief,
17 which states that it was filed and served on July 28, 2015, and calculated the time
18 for Appellants' reply brief accordingly, and incorrectly.

20 4. Counsel respectfully requests that the Court grant this motion, and
21 allow the filing of Appellants' Reply Brief one day late.

22 DATED: August 27, 2015

WOODBURN AND WEDGE
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26 By: / s / Gordon H. DePaoli
27 Gordon H. DePaoli, NSB 195
28 *Attorneys for Appellants*

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