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7 **IN THE SUPREME COURT OF NEVADA**

8 HOWARD SHAPIRO and JENNA  
9 SHAPIRO,

Appellant/Cross-Respondent

10 vs.

11 GLEN WELT, RHODA WELT, LYNN  
12 WELT, and MICHELLE WELT,

13 Respondent/Cross-Appellants.

Supreme Ct. No. 67363  
Dist. Ct. No. A-14-706566-C

**MOTION TO FILE SUPPLEMENTAL  
ANSWERING BRIEF IN 67363**

14  
15 GLEN WELT, RHODA WELT, LYNN  
16 WELT, and MICHELLE WELT,

Appellant

17 vs.

18 HOWARD SHAPIRO and JENNA  
19 SHAPIRO,

20 Respondent

Supreme Ct. No. 67596  
Dist. Ct. No. A-14-706566-C

21 Glenn Welt, Rhoda Welt, Lynn Welt and Michelle Welt (“the Welts”) request the  
22 opportunity to file a supplemental answering brief concerning docket 67363. On  
23 November 23, 2015 the Welts filed their answering brief and a motion to dismiss new,  
24 constitutional arguments. This motion was denied on Friday, December 4. The Welts  
25 now request that the Court accept as filed the supplemental brief submitted  
26 simultaneously with this motion.

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1 DATED this 7<sup>th</sup> day of December, 2015.

2 THORNDAL ARMSTRONG DELK  
3 BALKENBUSH & EISINGER

4 /s/ *Michael P. Lowry*

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Michael P. Lowry, Esq.  
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8 Attorneys for Glenn Welt, Rhoda Welt,  
9 Lynn Welt and Michele Welt

8 **MEMORANDUM OF POINTS AND AUTHORITIES**

9 **I. The merits of this appeal warrant a supplemental brief.**

10 On September 14, 2015 the Shapiros received a telephonic extension to file their  
11 opening brief. On October 2, 2015 they filed a motion for another short extension. The  
12 Welts did not object to or oppose either request. On November 23, 2015 the Welts filed  
13 their answering brief and a motion to dismiss new, constitutional arguments contained in  
14 the Shapiros' opening brief. This motion was denied on Friday, December 4.

15 The Welts have now prepared a supplemental answering brief addressing only  
16 these new, constitutional arguments. Even if the Welts two answering briefs were  
17 combined into one, they would still satisfy the length limitations of NRAP 32. Further,  
18 this supplemental brief does not prejudice the Shapiros as their reply brief is not due until  
19 December 23, 2015. To the extent any prejudice could arise, the Welts propose  
20 extending the Shapiros' filing deadline for their reply brief by twenty days from the date  
21 this motion is decided.

22 DATED this 7<sup>th</sup> day of December, 2015.

23 THORNDAL ARMSTRONG DELK  
24 BALKENBUSH & EISINGER

25 /s/ *Michael P. Lowry*

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Attorneys for Glenn Welt, Rhoda Welt,  
Lynn Welt and Michele Welt

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**CERTIFICATE OF SERVICE**

Pursuant to NRAP 25, on December 7, 2015 the **MOTION TO FILE SUPPLEMENTAL ANSWERING BRIEF IN 67363** was served upon each of the parties to appeal 67363 via electronic service through the Supreme Court of Nevada’s electronic filing.

*/s/ Michael P. Lowry*

An Employee of Thorndal, Armstrong, Delk,  
Balkenbush & Eisinger