

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

2
3 JENNIFER ELISE GORDON,

4 Appellant,

5 vs.

6 MATTHEW ROBERT GEIGER,

7 Respondent.
8
9

Case No.: 67955

District Court Case No. D

Electronically Filed
May 02 2016 02:14 p.m.

Tracie K. Lindeman

MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF
Clerk of Supreme Court

10 Respondent, MATTHEW ROBERT GEIGER, hereby moves this Honorable
11 Court under NRAP 31(b) for a 30-day extension of time to file his Answering Brief.

12
13 Respondent's Answering Brief is currently due on May 2, 2016. The Appellant
14 received a 14-day telephonic extension to file her Opening Brief. No previous
15 requests for extensions of time have been denied. If this Court grants the instant
16 request for a 30-day extension of time, the Respondent's Answering Brief will be due
17 on June 1, 2016. Good cause exists for allowing the Respondent to extend the filing
18 deadline until June 1, 2016, based upon the following:
19
20

21 1. In this family law case, Respondent received pro bono representation
22 through the Legal Aid Center of Southern Nevada.

23
24 2. Respondent's counsel does not regularly practice family law and is
25 unfamiliar with the unique rules, procedurals, and precedents in the area.

26
27 3. Moreover, Respondent's counsel accepted this case in addition to an
28 extremely heavy existing caseload.

1 4. Given the additional time needed to research complex legal issues in an
2 unfamiliar area of law, and the unusually large caseload of Respondent's counsel,
3 Respondent respectfully requests a 30-day extension to file his Answering Brief.
4

5 5. Respondent and Respondent's counsel are sensitive to the benefits of a
6 speedy resolution in this matter. They will do their best to file the Answering Brief
7 as soon as practicable and before the extended deadline, should this motion be
8 granted.
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10 This motion is submitted in good faith and for good cause shown in
11 accordance with NRAP 31(b).
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13 DATED this 2 day of May, 2016.
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16 BY: 

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CERTIFICATE OF SERVICE

I hereby certify pursuant to NRAP 25(c), that on the 2nd day of May, 2016, I caused service of a true and correct copy of the above and forgoing **MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF** pursuant to the Supreme Court Electronic Filing System:

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An employee of Kemp Jones & Coulthard, LLP