IN THE SUPREME COURT OF THE STATE OF NEVADA

ROBERT L. MENDENHALL, AN INDIVIDUAL; AND SUNRIDGE CORPORATION, A NEVADA CORPORATION, Appellants,	Electronically Filed Case No.: 68Aug 18 2016 10:13 a.m. Tracie K. Lindeman Clerk of Supreme Court
VS.	
RONALD TASSINARI, AN INDIVIDUAL; AND AMERICAN VANTAGE BROWNSTONE, LLC, A NEVADA LIMITED LIABILITY COMPANY, Respondents.	Appeal from the Eighth Judicial District Court, the Honorable Rob Bare Presiding

MOTION FOR EXTENSION OF TIME TO FILE <u>APPELLANTS' REPLY BRIEF</u> (First Request)

Marquis Aurbach Coffing

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Attorneys for Appellants, Robert L. Mendenhall and Sunridge Corporation

<u>MOTION FOR EXTENSION OF TIME TO FILE</u> <u>APPELLANTS' REPLY BRIEF</u> (First Request)

Appellants, Robert L. Mendenhall and Sunridge Corporation ("Appellants"), by and through their attorneys, Marquis Aurbach Coffing, hereby move this Court pursuant to NRAP 31(b) for a 30-day extension of time to file their reply brief.

Appellants' reply brief is currently due on August 22, 2016. If this Court grants this request for a 30-day extension, Appellants' reply brief will be due on September 21, 2016. Good cause exists for allowing Appellants to extend the filing deadline until September 21, 2016:

1. Appellate counsel, Micah Echols, only recently had oral argument scheduled in another of his cases (Case No. 66022, *Allen v. Dist. Ct.*) for September 15, 2016, and preparation for the oral argument in that case has caused an unforeseen delay in the completion of the reply brief in the instant case.

2. Additionally, on August 9, 2016, Mr. Echols received an order consolidating two cases (Case Nos. 68819 and 70520, *LVLP v. Nype*) and requiring that the opening brief be redrafted with nearly 9,000 fewer words on a shortened time of only 20 days. This has also caused an unforeseen delay in the completion of the reply brief in the instant case.

3. The requested extension will also allow additional time for the clients and co-counsel to review the brief and for Mr. Echols to address the requested revisions and finalize Appellants' reply brief.

Therefore, Appellants respectfully request that the deadline to file their reply brief be extended by 30 days to September 21, 2016. This motion is submitted in good faith and for good cause shown in accordance with NRAP 31(b).

Dated this 18th day of August, 2016.

MARQUIS AURBACH COFFING

By /s/ Micah S. Echols

Avece M. Higbee, Esq. Nevada Bar No. 3739 Micah S. Echols, Esq. Nevada Bar No. 8437 Adele V. Karoum, Esq. Nevada Bar No. 11172 10001 Park Run Drive Las Vegas, Nevada 89145 Attorneys for Appellants, Robert L. Mendenhall and Sunridge Corporation

<u>CERTIFICATE OF SERVICE</u>

I hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE APPELLANTS' REPLY BRIEF** was filed electronically with the Nevada Supreme Court on the <u>18th</u> day of August, 2016. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

> Harry Paul Marquis, Esq. James J. Lee, Esq. Nicholas J. Santoro, Esq. Oliver J. Pancheri, Esq.

> > <u>/s/ Leah Dell</u> Leah Dell, an employee of Marquis Aurbach Coffing