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Tracie K. Lindeman
Clerk of Supreme Court

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

16 YACOV JACK HEFETZ,

17 Plaintiff-Appellant,

18 v.

19 CHRISTOPHER BEAVOR,

20 Defendant-Appellee.

Case Nos.: 68438 / 68843

21 **MOTION FOR EXTENSION OF TIME TO FILE**
22 **REQUEST FOR TRANSCRIPT OF PROCEEDINGS**

23 Plaintiff/Appellant, Yacov Jack Hefetz (hereinafter referred to as
24 "Appellant"), by and through his counsel of record, H. Stan Johnson, Esq.
25 and Michael V. Hughes, Esq. of the law firm of
26 Cohen|Johnson|Parker|Edwards, respectfully requests that he be granted an
27 additional (15) days to file and serve his Request For Extension of Time To
28

1 File Request For Transcript Proceedings. The Appellant states the following
2 in support of this motion.

3 MEMORANDUM OF POINTS AND AUTHORITIES

4 I. STATEMENT OF FACTS

5 The Court ordered that request forms for the transcript of proceedings
6 were to be filed on or before January 22, 2016. The Appellant filed his
7 request forms for the transcript of proceedings with the Eighth Judicial
8 District Court on January 21, 2016. He then attempted to file with the
9 Nevada Supreme Court his proof of the Request for Transcript of
10 Proceedings on January 26, 2016. That filing was rejected because the Clerk
11 of the Supreme Court indicated that the proof of Request for Transcript of
12 Proceedings should have been filed on January 22, 2016. The Appellant
13 now seeks to extend the time for the filing of the proof of Request for
14 Transcript of Proceedings for a period an additional fourteen (14) days or
15 until February 5, 2016. The Appellant has never before requested any
16 extensions of time in connection with the above-captioned consolidated
17 cases and, thus, no extensions of time were previously denied or granted.

18 II. LEGAL STANDARD

19 NRAP 31(A) (3) governs motions for the extension of time to file
20 briefs. It provides in pertinent part that:

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22 (3) A motion for extension of time for filing a brief may be made no
23 later than the due date for the brief and must comply with the
24 provisions of this Rule and Rule 27.

25 (A) Contents of Motion. A motion for extension of time for filing a
26 brief shall include the following:

- 27 (i) The date when the brief is due;
28 (ii) The number of extensions of time previously
granted (including a 5-day telephonic extension), and if

1 extensions were granted, the original date when the brief was
2 due;

3 (iii) Whether any previous requests for extensions of
4 time have been denied or denied in part;

5 (iv) The reasons or grounds why an extension is
6 necessary; and

7 (v) The length of the extension requested and the date
8 on which the brief would become due.

9 III. DISCUSSION

10 The Appellant has diligently prosecuted the appeals in the above-
11 captioned consolidated cases. He filed his Notice of Appeal on July 20,
12 2015. He filed a Docketing Statement on August 14, 2015. He participated
13 in the mediation ordered by the Court, which was not successful as
14 evidenced by the filing on December 28, 2015 of a Final Report/No
15 Settlement. He then requested transcripts of proceedings from the Eighth
16 Judicial District Court on January 21, 2015. He then attempted to file with
17 this Court his proof of such requests on January 26, 2016. That attempted
18 filing was rejected by the Clerk of the Court on the grounds that it should
19 have been filed on January 22, 2016. The Appellant now seeks leave of the
20 Court to file the proof of that request on or before February 5, 2016 in order
21 that he may continue with diligent prosecution of the above-captioned
22 consolidated appeals especially in light of the fact that he has never before
23 requested any extensions from this Court.
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2 **IV. CONCLUSION**

3 For the reasons set forth above, it is therefore respectfully requested
4 that this Court grant Appellant, Yacov Jack Hefetz, an additional fifteen (15)
5 day extension of time in which to file its Request For Transcript
6 Proceedings. Such a date would be on or before February 5, 2016.

7 Dated this 27th day of January, 2016.


8 **COHEN | JOHNSON | PARKER | EDWARDS**

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20 *Yacov Jack Hefetz*
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CERTIFICATE OF SERVICE

The undersigned hereby certified that, on the 27th day of January, 2016, a true and correct copy of the foregoing **MOTION FOR EXTENSION OF TIME TO FILE TRANSCRIPT REQUEST FORM** was e-mailed and mailed in a sealed envelope to the following counsel of record and that postage was fully prepaid thereon:

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