

IN THE SUPREME COURT OF THE STATE OF NEVADA

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PEGGY CAIN, an Individual;
JEFFREY CAIN, an Individual;
and HELI OPS INTERNATIONAL,
LLC, an Oregon limited liability
company,

NO. 69333

Electronically Filed
Oct 07 2016 12:14 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

Appellants,

v.

RICHARD PRICE, an Individual; and
MICKEY SHACKELFORD, an
Individual,

Respondents.

PEGGY CAIN, an Individual;
JEFFREY CAIN, an Individual;
and HELI OPS INTERNATIONAL,
LLC, an Oregon limited liability
company,

NO. 69889

Appellants,

v.

RICHARD PRICE, an Individual; and
MICKEY SHACKELFORD, an
Individual,

Respondents.

MOTION FOR EXTENSION OF TIME FOR OPENING BRIEF
(First Request)

Appellants hereby move for a 30-day extension of time for filing the opening brief and appellants' appendix. The brief is presently due for filing on October 10, 2016. Therefore, appellants request an extension until November 9, 2016.

This is a complex appeal in a commercial lawsuit, with millions of dollars at stake. The procedural background is highly unusual, and the legal issues include issues of first impression dealing with contracts, releases and civil procedure. The appendix prepared by appellants' counsel consists of seven volumes and more than 1,600 pages. Appellants' counsel has spent a great deal of time reading the appendix.

The undersigned counsel has been working on the opening brief, in addition to preparation of briefs in other cases. Counsel will not be able to complete the brief by the current deadline of October 10, 2016. And once a draft brief is finished, it will need to be reviewed by other individuals working on the case.

Accordingly, appellants request a 30-day extension until November 9, 2016, for the opening brief and the appendix. This request is being made in good faith, without the intent to delay this appeal unnecessarily.

DATED: Oct. 7, 2016

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ATTORNEYS FOR APPELLANTS

CERTIFICATE OF SERVICE

I certify that I am an employee of Lemons, Grundy & Eisenberg and that on this date the foregoing was filed electronically with the Clerk of the Nevada Supreme Court, and therefore electronic service was made in accordance with the master service list as follows:

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DATED: 10/7/16

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