

IN THE SUPREME COURT OF THE STATE OF NEVADA

\* \* \* \* \*

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

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,

Appellants,

v.

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

Respondents.  
\_\_\_\_\_

NO. 69333

Electronically Filed  
Nov 04 2016 03:28 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

NO. 69889

**MOTION FOR EXTENSION OF TIME FOR OPENING BRIEF**  
**(Second 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 November 9, 2016. Therefore, appellants request an extension until December 9, 2016. This is the second motion for an extension.

As indicated in the first motion, this is a complex appeal, with millions of dollars at stake. The procedural background is unusual, and the legal issues include issues of first impression. 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.

Preparation of the brief has been more time-consuming than normal, because of the unusual and complex facts and legal issues. Additionally, counsel has been heavily involved in preparation of briefs in other cases, and counsel has had to tend to important personal matters out of the office (such as helping with the care of his elderly mother in Southern California).

Appellants' counsel will therefore not be able to complete the brief by the current deadline of November 9, 2016. Accordingly, appellants request a 30-day extension until December 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: 11/4/16

  
ROBERT L. EISENBERG (Bar No. 0950)  
Lemons, Grundy & Eisenberg  
6005 Plumas Street, Third Floor  
Reno, Nevada 89519  
775-786-6868  
Email: [rle@lge.net](mailto:rle@lge.net)

*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:

Rich Oshinski  
rick@oshinskiforsberg.com  
Attorney for Respondents

Michael Matuska  
mlm@matuskalawoffices.com  
Attorney for Appellants

Mark Forsberg  
mark@oshinskiforsberg.com  
Attorney for Respondents

DATED: 11/4/16

Chula Segura