

VIA FAX

IN THE SUPREME COURT OF THE STATE OF NEVADA

NEW HORIZON KIDS QUEST III,
INC., a Minnesota corporation;
DOES 1 through 10, inclusive; and
ROE CORPORATIONS 1 through
20 inclusive,

vs.

EIGHTH JUDICIAL DISTRICT
COURT OF THE STATE OF
NEVADA IN AND FOR THE
COUNTY OF CLARK; THE
HONORABLE SUSAN SCANN,
DISTRICT JUDGE,

and

ISABELLA GODOY, a Minor, by
and through her mother,
VERONICA JAIME,

Respondents.

Supreme Court Case No. 69920

District Court Case No.
A-14-707949-C

FILED

NOV 17 2016

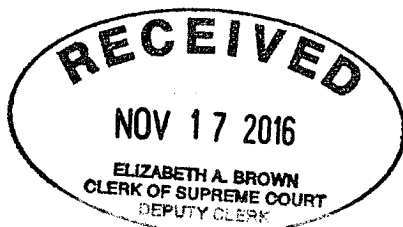
ELIZABETH A. BROWN
CLERK OF SUPREME COURT

BY
DEPUTY CLERK

Date: 11/17/2016
Time: 1:30 p.m.

RESPONDENT'S EMERGENCY MOTION UNDER NRAP 27(e)
Action Necessary by 1:30 P.M. on November 17, 2016

Respondent is requesting a continuance of the oral argument scheduled in this matter. Oral argument is currently scheduled today at 1:30 p.m. today, November 17, 2016. Martin Kravitz, Esq. is the lead attorney for Respondent and has prepared for the oral argument. See Certificate of Respondent's Counsel, attached as **Exhibit A**. Unfortunately, Mr. Kravitz woke up very ill this morning and is unable to appear this afternoon. *Id.* As a result, Respondent requests this Court continue the oral argument to the next available date. The office of the undersigned has already



16-35884

1 contacted the clerk of the Supreme Court, as well as opposing counsel regarding this
2 issue. *Id.* Both were contacted by telephone this morning prior to 9:00 am. *Id.* Ms.
3 Galati indicate she would not object to this Motion. *Id.* Mr. Tresse's office indicated
4 they did not believe he was attending the oral argument. *Id.*
5
6

7 Respectfully submitted this 17 day of November, 2016.
8

9 KRAVITZ, SCHNITZER & JOHNSON, CHTD.

10
11 
MARTIN J. KRAVITZ, ESQ.

12 Nevada Bar No. 83

13 JORDAN P. SCHNITZER, ESQ.

14 Nevada Bar No. 10744

15 8985 S. Eastern Avenue, Suite 200

16 Las Vegas, Nevada 89123

17 (702) 362-6666

18 *Attorneys for Respondents*

19 *Isabella Godoy, a Minor, by and through*
20 *her mother, Veronica Jaime*
21
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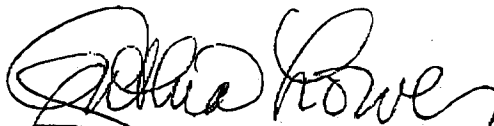
1
2 **CERTIFICATE OF SERVICE**

3 I CERTIFY that on the 17th day of November, 2016, I served by email and
4 facsimile the foregoing **RESPONDENT'S MOTION UNDER NRAP 27(e)** to:
5

6 Felicia Galati, Esq.
7 OLSON, CANNON, GORMLEY,
8 ANGULO & STOBERSKI
9 9950 West Charleston Ave.
10 Las Vegas, NV 89129
11 (702) 384-4012, Telephone
12 (702) 383-0701, Facsimile
13 fgalati@ocgas.com
14 *Attorneys for Petitioner*
15 *New Horizon Kids Quest III, Inc.*

16 Clay Treese, Esq.
17 2272-1 S. Nellis Blvd.
18 Las Vegas, NV 89142
19 (702) 727-4747, Telephone
20 (702) 727-4744, Facsimile
21 clay@claytreece.com
22 *Attorney for Anissa Wright*

23
24
25
26
27
28



An Employee of KRAVITZ, SCHNITZER &
JOHNSON, CHTD

EXHIBIT "A"

EXHIBIT "A"

1
2 **CERTIFICATE OF RESPONDENT'S COUNSEL**

3 STATE OF NEVADA }
4 } ss.
5 COUNTY OF CLARK }

6 I, Jordan Schnitzer, Esq., declare the following under penalty of perjury:

- 7
8 1. Respondent is requesting a continuance of the oral argument scheduled in this
9 matter.
10
11 2. Oral argument is currently scheduled today at 1:30 p.m. today, November 17,
12 2016.
13
14 3. Martin Kravitz, Esq. is the lead attorney for Respondent and has prepared for the
15 oral argument.
16
17 4. Unfortunately, Mr. Kravitz woke up very ill this morning and is unable to appear
18 this afternoon.
19
20 5. As a result, Respondent requests this Court continue the oral argument to the next
21 available date.
22
23 6. The office of the undersigned has already contacted the clerk of the Supreme
24 Court, as well as opposing counsel regarding this issue.
25
26 7. Both were contacted by telephone this morning prior to 9:00 am.
27
28 8. Ms. Galati indicated she had no objection.
9. Mr. Tresse's secretary indicated she did not believe Mr. Tresse planned on
attended the oral argument.

1
2 10. The undersigned has served a courtesy copy of this Motion by email and
3 facsimile prior to filing with the Supreme Court.

4 11. The telephone number and address of the undersigned is:

5 Martin J. Kravitz, Esq.
6 Jordan P. Schnitzer, Esq.
7 KRAVITZ, SCHNITZER & JOHNSON, CHTD.
8 8985 S. Eastern Avenue, Suite 200
9 Las Vegas, Nevada 89123
10 mkravitz@ksjattorneys.com
11 jschnitzer@ksjattorneys.com
12 (702) 222-4147, Telephone
13 (702) 362-2203, Facsimile

14 12. The telephone number and address of opposing counsel is:

15 Felicia Galati, Esq.
16 OLSON, CANNON, GORMLEY, ANGULO & STOBERSKI
17 9950 West Charleston Ave.
18 Las Vegas, NV 89129
19 (702) 384-4012, Telephone
20 (702) 383-0701, Facsimile
21 fgalati@ocgas.com
22 *Attorneys for Petitioner*
23 *New Horizon Kids Quest III, Inc.*

24 Clay Treese, Esq.
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27 (702) 727-4747, Telephone
28 (702) 727-4744, Facsimile
clay@claytreece.com
Attorney for Defendant
Anissa Wright

DATED this 17 day of November, 2016.


Jordan P. Schnitzer, Esq.

BROADCAST REPORT

TIME : 11/17/2016 09:52
 NAME : KSSJ
 FAX : 7023622203
 TEL :
 SER.# : BROA0J131439

PAGE(S)

06

DATE	TIME	FAX NO./NAME	DURATION	PAGE(S)	RESULT	COMMENT
11/17	09:49	3830701	42	06	OK	ECM
11/17	09:51	7274744	01:38	06	OK	ECM

BUSY: BUSY/NO RESPONSE
 NG : POOR LINE CONDITION
 CV : COVERPAGE
 PC : PC-FAX

Cyndee Lowe

From: Cyndee Lowe
Sent: Thursday, November 17, 2016 9:57 AM
To: 'fgalati@ocgas.com'; 'clay@claytreese.com'
Cc: Martin J. Kravitz (mkravitz@ksjattorneys.com); Jordan Schnitzer
Subject: New Horizon Kids/Godoy - Emergency Motion to Continue Oral Argument
Attachments: Emergency Mtn to Continue Oral Argument.pdf

Please find Respondent's Motion Under NRAP 27(e).

Cyndee Lowe

Assistant to Martin J. Kravitz, Esq.

KSJ

Kravitz, Schnitzer & Johnson

LAS VEGAS

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From: Edocs@kssattorneys.com [<mailto:Edocs@kssattorneys.com>]
Sent: Thursday, November 17, 2016 9:52 AM
To: Cyndee Lowe
Subject: Scanned document from Edocs@kssattorneys.com