

NETTLES LAW FIRM
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Attorney for Appellants,

Ingrid Patin and Patin Law Group, PLLC

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Elizabeth A. Brown
Clerk of Supreme Court

IN THE SUPREME COURT OF THE STATE OF NEVADA

INGRID PATIN, AN INDIVIDUAL; AND
PATIN LAW GROUP, PLLC, A
PROFESSIONAL LLC,

Appellants,

vs.

TON VINH LEE,

Respondent.

Supreme Court No. 69928

District Court Case No. A723134

MOTION FOR EXTENSION OF TIME TO FILE OPENING BRIEF

Appellants, Ingrid Patin, an individual, and Patin Law Group, PLLC, a Nevada Professional LLC, by and through their counsel of record, Christian M. Morris, Esq. of the Nettles Law Firm, hereby move this Court, pursuant to NRAP 31(b) for a thirty (30) day extension of time to file their Opening Brief.

A. Information Required by NRAP 31(b)

1. The Opening Brief and Appendix are due on August 8, 2017. If this Court grants this request for a thirty (30) day extension, the Opening

Brief and Appendix will be due on September 7, 2017, which is thirty (30) days from its current deadline of August 8, 2017;

2. No previous requests for extension have been requested.
3. This case consists of numerous documents which have required a substantial amount of time to review in preparing the Opening Brief and Appendix;
4. NRAP 31 normally allows the Appellant 120 days to prepare the Opening Brief and Appendix, but in the instant case, the Court has only allowed seven days since the denial of the Motion to Stay Briefing;
5. The workload of counsel for Appellants' counsel has been extremely demanding and has not permitted an adequate amount of time to prepare the Opening Brief and Appendix;
6. Appellants' counsel has filed and argued two Motions for Summary Judgment during the 120-day period, in addition to managing over 115 litigation cases;
7. Appellants' counsel has also recently had attorney turnover, losing an associate attorney and counsel is currently in preparation for a two-week wrongful death jury trial;
8. Appellants are also preparing a separate appeal to this Court on the denial of Appellants Motion for Summary Judgment in the underlying matter;
9. Appellants' counsel has explained the circumstances and need for an extension to Respondent's counsel and requested they not oppose,

however Respondent's counsel refused due to the fact Appellants previously filed the Motion to Stay which was denied;

10. Respondents have recently filed a Motion to Stay the entire underlying litigation, and a 90-day stay was granted, so no prejudice will result to Respondents by the extension;
11. This Motion is submitted in good faith and for good cause shown in accordance with NRAP 31(b).

Appellants respectfully submit that the foregoing demonstrates the requisite good cause and will not prejudice the parties or the eventual disposition of these two appeals considering the short length of the requested extension.

DATED this 4th day of August, 2017.

NETTLES LAW FIRM

/s/ Christian M. Morris, Esq.

CHRISTIAN M. MORRIS, ESQ.

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Attorneys for Appellants

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE OPENING BRIEF** was filed electronically with the Nevada Supreme Court on the 4th day of August, 2017. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

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/s/ Jenn Alexy
An Employee of NETTLES LAW FIRM