## **Marquis Aurbach Coffing**

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#### IN THE SUPREME COURT OF THE STATE OF NEVADA

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

> Appellants, Case No.: 69928

VS.

TON VINH LEE, Appeal from the Eighth Judicial District

Court, the Honorable Jennifer P.

**Togliatti Presiding** 

Respondent.

# UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE **OPENING BRIEF AND APPENDIX** (Second Request)

Appellants, Ingrid Patin and Patin Law Group, PLLC ("Appellants"), by and through their counsel of record, Marquis Aurbach Coffing, hereby move this Court pursuant to NRAP 31(b) for a 14-day extension of time to file their opening brief and appendix.

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Appellants' opening brief and appendix were originally due on August 8, 2017. This Court granted a 30-day extension of time making Appellants' opening brief and appendix currently due on September 7, 2017. If this Court grants this request for a 14-day extension, Appellants' opening brief and appendix will be due on September 21, 2017. Good cause exists for allowing Appellants to extend the filing deadline until September 21, 2017:

- 1. Mr. Echols was only recently retained and appeared in this case on August 28, 2017;
- 2. Mr. Echols' young daughter underwent her third major heart surgery on August 22, 2017. Mr. Echols was out of the office for an entire week to attend to his daughter during the early part of her recovery period, and was only able to work on an intermittent basis during that week;
- 3. A 14-day extension will allow enough time for the draft of the opening brief to be completed, reviewed by the client, and any revisions made prior to finalization and filing with this Court; and
- 4. Counsel for Appellants contacted Mr. Jones, counsel for Respondents, on August 30, 2017, and Mr. Jones does not oppose an additional 14-day extension.

Therefore, Appellants respectfully request that the deadline to file their opening brief and appendix be extended by 14 days to September 21, 2017. This unopposed motion is submitted in good faith and for good cause shown in accordance with NRAP 31(b).

Dated this 30th day of August, 2017.

### MARQUIS AURBACH COFFING

By /s/ Micah S. Echols

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# **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing <u>UNOPPOSED MOTION FOR</u>

<u>EXTENSION OF TIME TO FILE OPENING BRIEF AND APPENDIX</u> was filed electronically with the Nevada Supreme Court on the <u>30th</u> day of August, 2017. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Prescott Jones, Esq. Brian Nettles, Esq. Christian Morris, Esq.

/s/ Leah Dell

Leah Dell, an employee of Marquis Aurbach Coffing