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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,

vs.

TON VINH LEE,

Respondent.

Case No.: 69928

Appeal from the Eighth Judicial District  
Court, the Honorable Jennifer P.  
Togliatti Presiding

**MOTION FOR EXTENSION OF TIME TO FILE**

**OPENING BRIEF**

**(Third 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 5-day extension of time to file their opening brief.

Appellants' opening brief and appendix were originally due on August 8, 2017. This Court previously granted two extensions of time totaling 44 days, making Appellants' opening brief and appendix currently due on September 21, 2017. If this Court grants this request for an extension of 5 judicial days, Appellants' opening brief will be due on September 28, 2017. Good cause exists for allowing Appellants to extend the filing deadline until September 28, 2017:

Mr. Echols was brought into another case on an emergency basis on Monday evening, September 18, 2017, to draft a writ petition, which had to be filed in this Court by 11 a.m. on Tuesday, September 19, 2017 (docketed as Case No. 74001, *LVMPD v. Dist. Ct.*). This required Mr. Echols to draft throughout the night to meet such a demanding deadline and necessarily caused a delay in completing the opening brief in the instant case. In the underlying case (Eighth Judicial District Court Case No. C-16-318635-1, *State of Nevada v. David Frostick*), the District Court Judge has ordered a temporary stay of the jury trial but is requiring that a motion be filed in this Court on an emergency basis to expedite the decision on the writ petition in order to keep the stay in place, which has caused another delay in the completion of Appellants' opening brief.

Appellants have filed their appendix, and the opening brief is nearly complete. The additional 5 judicial days will allow time for the brief to be

completed, sent to the client and co-counsel for review, and for any requested revisions to be made.

Therefore, Appellants respectfully request that the deadline to file their opening brief be extended by 5 judicial days to September 28, 2017. This motion is submitted in good faith and for good cause shown in accordance with NRAP 31(b).

Dated this 21st day of September, 2017.

MARQUIS AURBACH COFFING

By /s/ Micah S. Echols  
Micah S. Echols, Esq.  
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## **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 21st day of September, 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