

IN THE SUPREME COURT OF THE STATE OF NEVADA

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

Appellants,

v.

TON VINH LEE,

Respondent.

Supreme Court Case No. 69928
District Court Case No. CV-15-73334-C

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Elizabeth A. Brown
Clerk of Supreme Court

**RESPONDENT'S MOTION FOR EXTENSION OF TIME TO
FILE ANSWERING BRIEF (FIRST REQUEST)**

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Respondent Ton Vinh Lee, an individual, by and through his counsel of record, Prescott T. Jones, Esq. of Resnick & Louis, P.C., hereby submit this Motion for Extension of Time to File Answering Brief (First Request) in the instant matter. Respondent requests a two-week extension of time, to November 16, 2017, to file its Answering Brief. The Answering Brief is currently due November 2, 2017. There have been no prior requests for an extension of time to file the Answering Brief.

Good cause exists for the extension of time as the undersigned counsel has been retained in a case that is set for a month-long trial beginning November 27, 2017. Additionally, while NRAP 31(a)(1)(B) allows 30 days from the filing of an Opening Brief to file an Answering Brief, Appellant's Opening Brief includes numerous arguments improperly outside of the scope of the appeal, including a significant argument that is being raised for the first time on appeal. This has resulted in a significant amount of additional work that will not be able to be completed within the 30-day period ending November 2, 2017.

Accordingly, Respondent requests an additional 14 days to file his Answering Brief, such that the brief would be due on November 16, 2017. This motion is submitted in good faith and for good cause shown in accordance with NRAP 31(b)(3).

Dated this 1st day of November, 2017.

RESNICK & LOUIS, P.C.



PRESCOTT T. JONES, ESQ.

Nevada Bar No. 11617

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Las Vegas, Nevada 89148


Attorneys for Respondent Ton Vinh Lee

I hereby certify that I am an employee of Resnick & Louis, P.C., and on the 1st day of November, 2017, I mailed a copy of the filed Respondent's Motion for Extension of Time to File Answering Brief (First Request) upon the following party via first class mail with sufficient postage prepaid to the following address:

Christian M. Morris, Esq.
Brian D. Nettles, Esq.
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MARQUIS AURBACH COFFING
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DATED this 1st day of November, 2017.



Lisa G. Bell