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Elizabeth A. Brown
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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 REPLY BRIEF
(First 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 30-day extension of time to file their reply brief.

Appellants’ reply brief is currently due on December 21, 2017. This is Appellants’ first request for an extension of time to file their reply brief. If this

Court grants this request for a 30-day extension, Appellants' reply brief will be due on January 22, 2018. Good cause exists for allowing Appellants to extend the filing deadline until January 22, 2018:

Mr. Echols was recently brought into another case on an urgent basis to draft a writ petition and seek a stay of the District Court proceedings, which currently has only a short temporary stay in place (*Troisier v. Las Vegas Paving Corporation*, District Court Case No. A-16-735135-C). Drafting the brief and motion in that case on a short deadline has caused an unforeseen delay in completing the reply brief in the instant appeal.

Additionally, Mr. Echols has an opening brief and appendix that are also due on December 21, 2017 in Supreme Court Case No. 74048 (*The Original Roofing Company v. OSHA*). One extension has already been granted in Case No. 74048, and counsel is diligently working to meet tomorrow's deadline. This has also caused a delay in completing the reply brief in the instant appeal.

An additional 30 days will allow Appellants' reply brief to be completed and circulated to the client for review and for counsel to make any needed revisions prior to filing with the Court. Appellants plan to file their reply brief on or before the requested due date of January 22, 2018.

Therefore, Appellants respectfully request that the deadline to file their reply brief be extended by 30 days to January 22, 2018. This motion is submitted in good faith and for good cause shown in accordance with NRAP 31(b).

Dated this 20th day of December, 2017.

MARQUIS AURBACH COFFING

By /s/ Micah S. Echols
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF** was filed electronically with the Nevada Supreme Court on the 20th day of December, 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