Case No. 69997

In the Supreme Court of Nevada

MICHAEL FOLEY,

Appellant,

vs.

PATRICIA FOLEY,

Respondent.

Electronically Filed Mar 21 2017 10:02 a.m. Elizabeth A. Brown Clerk of Supreme Court

MOTION FOR EXTENSION OF TIME TO FILE OPENING BRIEF

Appellant Michael Foley requests 30 days, through April 20, 2017, to file his opening brief. NRAP 31(b)(3). This is the first such request. Without an extension, the brief would be due March 21, 2017.

More time is necessary to complete the opening brief. The important questions in this appeal go to the heart of systemic injustices taking place in Clark County's family courts and merit a carefully prepared brief. *Pro bono* counsel has begun researching the issues and recently received the transcripts of some hearings before the district court, but it appears the record may be incomplete. It is imperative that counsel resolve these issues before submitting the opening brief.

Dated this 21st day of March, 2017.

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By: /s/ Abraham G. Smith

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CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2017, I submitted the foregoing "Motion for Extension of Time to File Opening Brief" for filing via the Court's eFlex electronic filing system.

I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage prepaid, at Las Vegas, Nevada, addressed as follows:

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/s/ Jessie M. Helm

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