

**In the Supreme Court of Nevada**

MICHAEL FOLEY,  
Appellant,  
  
*vs.*  
PATRICIA FOLEY,  
Respondent.

Electronically Filed  
Apr 21 2017 09:19 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 May 22, 2017, to file his opening brief. NRAP 31(b)(3). This is the second such request. The brief was originally due March 21, 2017 and presently is due April 20, 2017. No requests for extension have been denied or denied in part.

Although *pro bono* counsel have diligently worked to complete the brief, more time is necessary. Discussions with prospective *amici* who are familiar with this area of the law have alerted counsel to additional issues. Prospective *amici* have also requested additional time to review the opening brief, given the compressed deadlines under NRAP 29. The requested extension will assist both counsel and prospective *amici* to present clear and focused arguments.

Dated this 20th day of April, 2017.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/ Abraham G. Smith

DANIEL F. POLSENBERG (SBN 2376)

ABRAHAM G. SMITH (SBN 13,250)

3993 Howard Hughes Parkway

Suite 600

Las Vegas, Nevada 89169

(702) 949-8200

*Attorneys for Appellant*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 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:

PATRICIA FOLEY  
8937 Austin Ridge Avenue  
Las Vegas, Nevada 89178

Alan L. Bennett  
Robert J. Gardner  
OFFICE OF DISTRICT ATTORNEY  
FAMILY SUPPORT DIVISION  
1900 East Flamingo Road, Suite 100  
Las Vegas, Nevada 89119

/s/ Abraham G. Smith  
An Employee of Lewis Roca Rothgerber Christie LLP