


In the Supreme Court of Nevada

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

**FILED**

JAN 19 2018

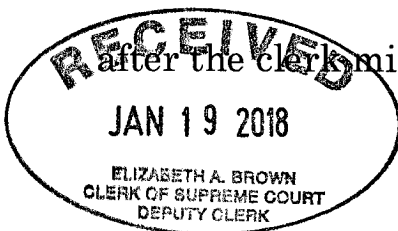
ELIZABETH A. BROWN  
CLERK OF SUPREME COURT  
BY  DEPUTY CLERK

**MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF**

Appellant Michael Foley requests an extension through February 20, 2018 to file his reply brief. See NRAP 31(b)(3). This is the second such request. The brief was originally due December 13, 2017 and is now due January 16, 2018.

Additional time is necessary. First, Mr. Smith, the *pro bono* attorney primarily responsible for drafting the reply brief unexpectedly had to take time to assist some family friends who were suddenly rendered homeless with their infant son due to circumstances outside of their control. Second, while counsel's caseload is ordinarily not a reason to extend deadlines, Mr. Smith's *pro bono* cases have been unusually demanding, including the reopening and resolution of a divorce matter

after the clerk mistakenly dismissed the case before the entry of a de-




cree, and the filing of an appeal on behalf of a civil-rights plaintiff whose claims were dismissed. Third, Mr. Polsenberg has also had to dedicate significant time to preparing for and arguing the writ petition in *Wynn v. District Court*, Case No. 74184—his third oral argument before this Court in a month—which prevented him from assisting Mr. Smith in the preparation of this reply.

Counsel recognizes the importance of the *pro bono* program and seeks this extension to focus and clarify the significant issues presented in this appeal.

Dated this 16th day of January, 2018.

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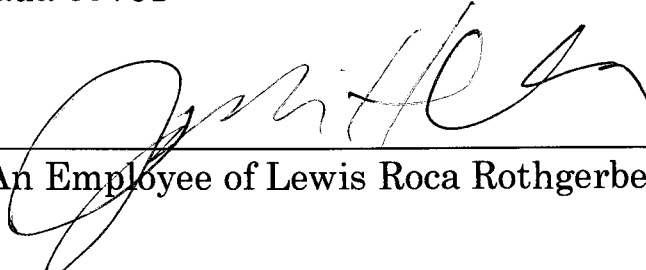
**CERTIFICATE OF SERVICE**

I hereby certify that on January 16, 2018, I served a copy of the  
“Motion for Extension of Time to File Reply Brief” by mailing a true and  
correct copy thereof, postage prepaid, at Las Vegas, Nevada, addressed  
as follows:

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