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14 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

15 * * * *

16 **No.: 71873**

17 IN THE MATTER OF THE PARENTAL
18 RIGHTS AS TO S.L.; N.R.B.; H.R.B.;
19 AND W.C.B.

20

DONALD BROWN

21 Appellant,

22 vs.

23 THE STATE OF NEVADA,
24 DEPARTMENT OF FAMILY SERVICES;
25 S.L.; N.R.B.; H.R.B.; AND W.C.B.

26 Respondents.

27

IN THE MATTER OF THE PARENTAL
28 RIGHTS AS TO S.L.; N.R.B.; H.R.B.;
AND W.C.B.

Electronically Filed
Feb 28 2017 04:13 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Consolidated with No. 71889

DC Case No.: C-14-298689-1
C-14-299574-2

**APPELLANT'S DONALD BROWN AND
MELISSA LAWRENCE'S MOTION FOR
ENLARGEMENT OF THE BRIEFING
SCHEDULE**

1 MELISSA LAWRENCE

2 Appellant,

3 vs.

4 THE STATE OF NEVADA,
5 DEPARTMENT OF FAMILY SERVICES;
6 S.L.; N.R.B.; H.R.B.; AND W.C.B.

7 Respondents.
8

9 COMES NOW the Appellant DONALD BROWN by and through his counsel, ROBERT
10 M. DRASKOVICH, ESQ. of TURCO & DRASKOVICH, LLP, and Appellant MELISSA
11 LAWRENCE by and through her counsel, MICHAEL I. GOWDEY, ESQ. of the LAW
12 OFFICES OF MICHAEL I. GOWDEY (collectively "APPELLANTS") and does hereby submit
13 their Appellant's Motion for Enlargement of the Briefing Schedule.
14

15 APPELLANTS respectfully move this Court for an extension of time within which to file
16 APPELLANTS' Opening Brief and an enlargement of the briefing schedule accordingly.
17 APPELLANTS request an extension of 60 days from the current deadline of March 28, 2017, to
18 and including, May 30, 2017.
19

20 Pursuant to NRAP 26(b)(1)(A) this Court may extend the time to perform any act for
21 good cause. Due to staffing limitations and scheduling conflicts resulting from This Courts
22 consolidation of its cases No. 71873 and No. 71889, APPELLANTS' counsel will not be able to
23 adequately and fully prepare APPELLANTS' Opening Brief and joint appendix in time for the
24 March 28, 2017, deadline. This is compounded by the need for APPELLANTS to wait for
25 transcripts to be filed into Case No. 71873 as they are currently outstanding. APPELLANTS'
26 counsel and their respective law firms are currently expending all available resources to address
27
28

1 said staffing limitations and scheduling conflicts, and an extension of time will allow
2 APPELLANTS' Counsel to better prepare APPELLANTS' argument, opening brief, and joint
3 appendix.

4 The need for this extension is of no fault to APPELLANTS. APPELLANTS have not
5 previously requested an extension of time within which to file their Opening Brief.
6

7 This motion is not entered for purposes of delay or any other improper reason.
8 APPELLANTS simply seek a sufficient extension of time that will allow APPELLANTS
9 counsel to adequately prepare the Opening Brief considering the unfortunate circumstances of
10 counsel's staffing limitations, scheduling conflicts, and lack of transcripts.

11 **WHEREFORE**, APPELLANTS pray this Honorable Court make an Order directing that
12 APPELLANTS' deadline to file their Opening Brief be enlarged with a new due date of May 30,
13 2017 with the briefing schedule to be amended accordingly pursuant to NRAP 31(a)(2).
14

15 DATED this 28th day of February, 2017
16

17
18 /s/ Robert M. Draskovich
19 By: _____
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