

IN THE SUPREME COURT OF THE STATE OF NEVADA

ENRIQUE RODRIGUEZ, AN
INDIVIDUAL,

Appellant,

vs.

FIESTA PALMS, LLC, A NEVADA
LIMITED LIABILITY COMPANY,
D/B/A PALMS CASINO RESORT,
N/K/A FCH1, LLC, A NEVADA
LIMITED LIABILITY COMPANY,

Respondent.

Case No.: 72098 Electronically Filed
May 16 2017 02:29 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Appeal from the Eighth Judicial District
Court, the Honorable Joe Hardy
Presiding

MOTION FOR EXTENSION OF TIME TO FILE
OPENING BRIEF AND APPENDIX
(First Request)

Marquis Aurbach Coffing

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Enrique Rodriguez

Appellant, Enrique Rodriguez, by and through his counsel of record, Marquis Aurbach Coffing, hereby moves this Court pursuant to NRAP 31(b) for a 30-day extension of time to file his opening brief and appendix.

Rodriguez's opening brief and appendix are currently due on May 16, 2017. If this Court grants this request for a 30-day extension, Rodriguez's opening brief and appendix will be due on June 16, 2017. Good cause exists for allowing Rodriguez to extend the filing deadline until June 16, 2017:

1. Rodriguez's opening brief has largely been drafted, but it is currently over the word count limit allowed by NRAP 32(a)(7). Counsel for Rodriguez are working to revise the opening brief to comply with the word count limitation and to make the brief more concise;

2. The workload of counsel for Rodriguez has been extremely demanding, and has not permitted an adequate amount of time to revise and finalize the opening brief and appendix;

3. The requested extension will also allow time for the client to review the opening brief and for counsel to make any requested revisions;

4. Lead appellate counsel, Micah Echols, was out of town May 9–12 to attend and present at the Nevada Government Civil Attorneys Conference, and the preparation, attendance, and presentation caused some delay in the revision and finalization of Rodriguez's opening brief; and

5. In addition to his normal caseload, Mr. Echols was pulled into trial at the last minute in *Weingarten Nostat, Inc. v. Mr. D, LLC* (District Court Case No. A-15-721131-C) and has been heavily involved in post-trial briefing. He was also brought in immediately after trial in *Ryles v. Holloway* (District Court Case No. A-14-702291-C) and has been heavily involved in post-trial briefing in this case as well. The demands of both of these cases have cause an unforeseen delay in the completion of the opening brief and appendix in the instant case.

Therefore, Rodriguez respectfully requests that the deadline to file his opening brief and appendix be extended by 30 days to June 15, 2017. This motion is submitted in good faith and for good cause shown in accordance with NRAP 31(b).

Dated this 16th day of May, 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 OPENING BRIEF AND APPENDIX** was filed electronically with the Nevada Supreme Court on the 165th day of May, 2017. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Lew Brandon, Esq.
Robert Eisenberg, Esq.

I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage prepaid, addressed to:

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/s/ Leah Dell

Leah Dell, an employee of
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