

IN THE SUPREME COURT OF THE STATE OF NEVADA

Electronically Filed
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Elizabeth A. Brown
Clerk of Supreme Court

ELIZABETH C. HOWARD,
an individual,

Case No. 72685

Appellant,

vs.

SHAUGHNAN L. HUGHES,

Respondent.

ELIZABETH C. HOWARD,
an individual,

Case No. 72965

Appellant,

vs.

SHAUGHNAN L. HUGHES,

Respondent.

**RESPONDENT, SHAUGHNAN L. HUGHES',
OPPOSITION TO APPELLANT'S MOTION TO EXTEND TIME
TO FILE RESPONSE TO ORDER TO SHOW CAUSE**

COMES NOW, Respondent, SHAUGHNAN L. HUGHES ("HUGHES"), by and through his counsel, ALLISON MacKENZIE, LTD., and hereby opposes Appellant's Motion to Extend Time to File Response to Order to Show Cause in Docket No. 72965 as follows:

Counsel for Appellant contends that this Court's Order to Show Cause was not delivered to his secretary's email address. He makes no argument concerning delivery to his own email address. Mr. Kozak is registered with the Court's electronic filing

1 system, not his secretary, and there is no plausible basis to his contention that he was
2 not served with the July 26, 2017 Order to Show Cause.

3 Further, while no briefs have yet been filed in this matter, HUGHES requests
4 the Court take notice of the district court's March 1, 2017 and April 24, 2017
5 sanctions orders from which the instant appeal was taken. In those orders, the Court
6 will see that Mr. Kozak was sanctioned for this very behavior (i.e., missing several
7 deadlines and blaming his deadline failures on his office staff). This is a pattern that
8 should not be allowed to continue.

9 For these reasons, HUGHES respectfully requests that Appellant's Motion to
10 Extend Time be denied and the appeal in Docket No. 72965 be dismissed.

11 Respectfully submitted this 1st day of September, 2017.

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19 JUSTIN M. TOWNSEND, ESQ.
20 Nevada State Bar No. 12293

21 Attorneys for Respondent,
22 SHAUGHNAN L. HUGHES
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CERTIFICATE OF SERVICE

Pursuant to NRAP Rule 25(c), I hereby certify that I am an employee of ALLISON MacKENZIE, LTD., Attorneys at Law, and that on this date I caused the foregoing document to be served to all parties to this action by:

☒ Placing a true copy thereof in a sealed postage prepaid envelope, first class mail, in the United States Mail in Carson City, Nevada [NRAP 25(c)(1)(B)]

☒ Court's E-flex system

☐ Electronic Transmission

Via Court's E-flex System:

Charles R. Kozak, Esq.

Via United States Mail:

JONATHAN L. ANDREWS
SETTLEMENT JUDGE
14300 POLELINE ROAD
RENO, NV 89511

DATED this 1st day of September, 2017.

/s/ Nancy Fontenot
NANCY FONTENOT