EXHIBIT 1

IN THE SUPREME COURT OF THE STATE OF NEVADA

ELIZABETH C. HOWARD, an individual, Appellant, v. SHAUGHAN L. HUGHES, Respondent.	Case No. 72965 and 72685

OPPOSITION TO REQUEST FOR DISMISSAL

On August 31, 2017, Appellant filed a Motion to Extend Time to Respond to Order to Show Cause. Appellant filed the Motion before the deadline to Respond to the Order. On September 5, 2017, Appellant filed the requisite Response. Any delay was *de minimis* and non-prejudicial. Respondent Shaughan Hughes, citing no legal authority whatsoever, requests dismissal of the appeal in its entirety.

This Court has a sound policy preference for deciding cases on the merit. *Huckabay Props. v. NC Auto Parts*, 322 P.3d 429 (Nev. 2014). Respondent has made no attempt to tie the *de minimis* delay to the merits of the appeal. Appellant Elizabeth Howard was attentive to the deadline and timely filed a Motion to Extend Time in lieu of a Response. Further, Appellant filed the Response within one week. No further extension of time is necessary.

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The Order to Show Cause is chiefly a matter between the Court and Appellant. Respondent's Request to Dismiss attempts to "piggyback" resolution of the merits of the case upon the tangential Order to Show Cause. Respondent has no dog in this fight. The Order and Response do not speak to the underlying merits of this case. Accordingly, Respondent's Request for Dismissal should be DENIED.

Pursuant to NRS 239B.030: The undersigned does hereby affirm that the within document does not contain the social security number of any person.

Dated this 15th day of September 2017.

By:/s/ Charles R. Kozak, Esq.
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CERTIFICATE OF SERVICE

Pursuant to NRCP Rule 5(b), I hereby certify I am an employee of Kozak Lusiani Law, LLC and that on September 15, 2017, I electronically filed the **APPELLANT'S OPPOSITION TO REQUEST FOR DISMISSAL** with the Clerk of the Court by using the electronic filing system which will send a notice of electronic filing to the following:

Allison & MacKenzie, LTD. / Justin M. Townsend, Esq.

DATED September 15, 2017.

/s/ Dedra L. Sonne
Dedra L. Sonne
Employee of Kozak Lusiani Law, LLC

IN SUPREME COURT OF THE STATE OF NEVADA

ELIZABETH C. HOWARD, an individual,

Appellant,

vs.

SHAUGHNAN L. HUGHES,

Respondent.
_____/

Supreme Court No.: 72685

Electronically Filed
Sep 15 2017 03:25 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

ELIZABETH C. HOWARD, an individual,

Appellant,

vs.

SHAUGHNAN L. HUGHES,

Respondent.
_____/

Supreme Court No.: 72965

APPELLANT'S MOTION TO EXTEND TIME TO FILE OPPOSITION TO REQUEST FOR DISMISSAL

COMES NOW, Appellant, and moves this Court for an Order to extend time to respond to its Respondent's Request for Dismissal. This Motion is based on the papers on file herein along with the following points and authorities.

NRAP 26(b)(1)(A) provides: "For good cause, the court may extend the

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time prescribed by these Rules or by its order to perform any act, or may permit an act to be done after that time expires."

On July 26, 2017, this Court entered an Order to Show Cause, giving Appellant to and including August 25, 2017 in which to respond. However, counsel's office was unaware of the Order entered as it was not sent to the primary calendaring email of dedra@kozaklusianilaw.com. On August 31, 2017, Respondent filed his Request for Dismissal predicated on counsel's failure to respond timely to the Court's Order to Show Cause. Immediately upon learning of the Order to Show Cause on August 31, 2017, Appellant filed her Motion to Extend Time to File Response to Order to Show Cause. On September 1, 2017, Respondent filed his Opposition to Appellant's Motion to Extend Time to File Response to Order to Show Cause. On September 5, 2017, Appellant filed her Response to the Order to Show Cause (which remains pending). On September 11, 2017 Appellant filed her Reply in Support of Motion to Extend Time in Docket No. 72965. Out of an abundance of caution on September 15, 2017, Appellant submitted her Opposition to Request for Dismissal. The Opposition was rejected by the Clerk as untimely with the suggestion that Appellant file an Motion to Extend Time to file Opposition, consequently Appellant hereby moves for an Extension of Time to file Opposition. The Court has yet to rule on Appellant's August 31, 2017 Motion

to Extend Time to File Response to Order to Show Cause in Docket No. 72965; therefore, an Opposition to Respondents Request for Dismissal is actually premature.

According to the Clerk's instruction, the Opposition to the Request for Dismissal is attached hereto as Exhibit 1.

DATED September 15, 2017.

/s/ Charles R. Kozak
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Attorney for Appellant

CERTIFICATE OF SERVICE

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Allison & MacKenzie, LTD. / Justin M. Townsend, Esq.

DATED September 15, 2017.

/s/ Dedra L. Sonne
Dedra L. Sonne
Employee of Kozak Lusiani Law, LLC