

IN THE SUPREME COURT OF THE STATE OF NEVADA

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VETERANS IN POLITICS
INTERNATIONAL, INC.; AND STEVE W.
SANSON,

Appellants,

vs.

MARSHAL S. WILLICK; AND WILLICK
LAW GROUP,

Respondents.

S.C. NO.

D.C. NO:

Electronically Filed
Oct 12 2017 08:39 a.m.
Elizabeth A. Brown
Clerk of Supreme Court
72778
A-17-750171-C

MOTION TO EXTEND DEADLINE FOR ANSWERING BRIEF

Respondent hereby moves this Court to extend the deadline for the Answering Brief in this appeal pending resolution of the Motion to Consolidate currently before this Court.

This case is one of three involved in a Motion to Consolidate multiple appeals, the outcome of which will impact the scope of the Answering Brief in this case and, should consolidation not be granted, much of the Opening Brief, and perhaps the Appendix, should be stricken before an Answering Brief is filed.

This motion is based upon the pleadings and papers on file herein, and the following points and authorities.

POINTS AND AUTHORITIES

This Court currently has pending before it a *Motion to Consolidate* in *Saiter*, Case No. 72819, which was (per direction of the Clerk's Office) also filed in this action and in Case No. 73838. As detailed in that *Motion*, all three cases arise out of the *Saiter* divorce case, and are intertwined and interrelated. Those facts are also discussed as part of the *Response to Order to Show Cause* filed in Case No. 72819 by direction of this Court.

The *Opening Brief* filed by Sanson in this case makes substantial (if inaccurate) reference to the *Saiter* case, both below and on appeal, and similar inaccurate representations to the Abrams Appeal.¹ If the cases are consolidated, the misrepresentations made as to those matters can be addressed in the *Answering Brief*. Otherwise, the references to all those cases are improper, and we would move to have the brief (and any portions of the Appendix not actually existing in the case file appealed from) stricken before filing the *Answering Brief*.

In the interest of judicial economy, it does not seem reasonable to move to strike while the question of consolidation (and the order to show cause in *Saiter*) remain outstanding.

¹ The brief also makes reference to an unrelated divorce case, *Ansell*, as detailed in the *Motion to Consolidate*. What references to that action, if any, that the Court may choose to permit is a separate question from the matter of the three intertwined appeals.

It is in the interest of all parties to all three cases to not have to spend any more time than is actually required on either motion proceedings or in the litigation of the appeals themselves, and moving forward with a motion to strike the opening brief in this case could well be wasted time and effort for both the parties and this Court, depending on decisions to be made on the pending motions.

Additionally, given the overlapping “cast of characters” in all three appeals, all of these cases are expected to be matters of discussion in the appellate settlement conference scheduled in Case No. 73838 and counsel in all three cases are scheduled to attend. Given the cases and issues, it seems unlikely that any one case could settle without including resolution of the other two as well.

Joshua P. Gilmore, Esq., of Bailey Kennedy, LLP, called counsel for Appellants, Anat Levy, Esq., on October 11, 2017, to request a stipulation and, when an unconditional stipulation was rejected, informed her of this motion.

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Accordingly, it is respectfully submitted that briefing be extended in this case until a decision is made on both the consolidation and show cause matters.

DATED this 11th day of October, 2017.

Respectfully submitted:

THE ABRAMS & MAYO LAW FIRM

/s/ Jennifer V. Abrams, Esq.

Jennifer V. Abrams, Esq.

Nevada State Bar Number: 7575

6252 S. Rainbow Blvd., Suite 100

Las Vegas, Nevada 89118

Attorney for Respondent

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of The Abrams & Mayo Law Firm, and that *Motion to Extend Deadline for Answering Brief* was filed electronically with the Nevada Supreme Court in the above-entitled matter on Wednesday, October 11, 2017. I further certify that the foregoing brief was served on the following interested parties, via electronic service pursuant to NEFCR 9, to:

Anat Levy, Esq.
Anat Levy and Associates, P.C.
Attorney for Appellant

/s/ David J. Schoen, IV, ACP
An Employee of THE ABRAMS & MAYO LAW FIRM