

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

2 RICHARD KILGORE,
3 Appellant/Respondent,
4 vs.
5 ELENI KILGORE,
6 Respondent/Cross-
7 Appellant.

Case No.: 73977

District Court Case No. D-1248977-15
Electronically Filed Aug 01 2018 07:44 a.m.

Appeal from the Eighth Judicial District Court, the Honorable Elizabeth A. Brown presiding
Clerk of Supreme Court

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9 **RESPONDENT/CROSS-APPELLANT'S OPPOSITION TO APPELLANT'S**
10 **MOTION FOR EXTENSION OF TIME**

11 Respondent/Cross-Appellant, ELENI KILGORE, by and through her
12 counsel, Fred Page, Esq. hereby submits her Opposition to Appellant's Opposition
13 to Motion For Extension of Time. This Opposition is based upon the following
14 Memorandum of Points and Authorities and all pleadings on file herein.
15

16 DATED this 31st day of July 2018

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18 PAGE LAW OFFICE

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21 FRED PAGE, ESQ.
22 Nevada Bar No. 6080
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26 Attorney for Respondent/Cross-Appellant
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Memorandum of Points and Authorities

Appellant has filed four motions for an extension of time which to file the Opening Brief. The three prior motions for an extension of time were February 27, 2018, June 6, 2018, and June 12, 2018.

The February 27, 2018, motion for extension of time was to obtain the transcripts.

The June 6, 2018, motion for extension of time was filed alleging that an extension was needed to complete and file the appendix and brief, and that only five days were needed. *See Mot. at page 2, lines 15-22.*

On June 14, 2018, six days after the June 6, 2014, motion was filed, a motion for extension of time was filed alleging that “opening brief has since been completed,” but that the Clerk of the Court contacted Appellant and informed him that 60 pages were missing from the appendix. *See Mot. at page 1, lines 24-28.*

In the June 19, 2018, motion for extension of time it was alleged that “more time was needed to finalize citations in the case” and that “there has been some issue with counsel’s computer and formatting has been an issue.” *See Mot. at page 1, lines 24-28.*

If the opening brief has been completed as stated in the June 14, 2018, motion, no further time should have been needed in which to finalize citations or format the brief.

1 NRAP 31(3)(A)(i)-(v) provides that a motion for extension of time for filing
2 a brief may be made no later than due and must include the date when the brief is
3 due, the number of extensions previously granted, when the brief was originally
4 due, the reasons or grounds why an extension is necessary, and; the length of the
5 extension. The motion omits the prior number of extensions granted and when the
6 brief was originally due.
7

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9 Respondent/Cross-Appellant has filed no prior oppositions. Based upon the
10 foregoing, Respondent/Cross-Appellant requests that Appellant's motion for
11 extension should be denied.
12

13 DATED this 31st day of July 2018
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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Page Law Office and that on July 31, 2018, I electronically filed with the Supreme Court a true and correct copy of the above and foregoing **RESPONDENT/CROSS-APPELLANT'S OPPOSITION TO MOTION FOR EXTENSION OF TIME**

I further certify that on July 31, 2018, I served a true and correct copy of the above and foregoing **RESPONDENT/CROSS-APPELLANT'S OPPOSITION TO MOTION FOR EXTENSION** via e-service and U.S. Mail, postage prepaid, to the following:

Betsy Allen, Esq.
P.O. Box 46991
Las Vegas, Nevada 89114
Attorney for Appellant



An employee of Page Law Office