

In the Supreme Court of Nevada

GEORGE STUART YOUNT,
individually, and in his capacity as
owner of GEORGE STUART YOUNT
IRA,

Appellant,

vs.

CRISWELL RADOVAN, LLC; CR CAL
NEVA, LLC; ROBERT RADOVAN;
WILLIAM CRISWELL; CAL NEVA
LODGE, LLC; POWELL COLEMAN AND
ARNOLD LLP; DAVID MARRINER; AND
MARRINER REAL ESTATE, LLC,

Respondents.

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Elizabeth A. Brown
Clerk of Supreme Court

**REPLY IN SUPPORT OF “MOTION FOR
EXTENSION TO FILE REPLY BRIEF”**

1. Appellant’s Counsel Moved in Good Faith

Undersigned counsel seek this extension in good faith for the medical and scheduling reasons described in the motion. This is the third such motion, the second after the Court ordered a combined reply brief to the two respondents’ briefs. No request for additional time has been denied or denied in part.

**2. *The Unexpected Circumstances are
Genuine and Interfered in Counsel's
Sincere Efforts to Complete the Reply***

Contrary to respondents' representations that there is no extreme need, the unexpected circumstances here are genuine and interfered in counsel's efforts to complete the reply.

First, Mr. Smith, who had helped draft much of the opening brief, injured his ear last week and temporarily lost all hearing in his left ear. Mr. Smith has also been ill, disrupting his work schedule and taking time away from the preparation of the brief.

Second, the scheduling difficulties were genuine. In addition to counsel's out-of-state travel plans, this Court set oral argument for October 7, 2019 in *Paulos v. FCH1, LLC*, Docket No. 74912. Preparing for this argument necessarily took priority.

**3. *Counsel Are Working to File
Ahead of the Requested Deadline***

Counsel do not intend to cause unnecessary delay. Counsel have completed a draft of the brief, but need additional time to review it and streamline the arguments for filing. Counsel understands the extraordinary nature of a request for extension and appreciates this Court's courtesy. The extraordinary circumstances here warrant it.

CONCLUSION

In light of these circumstances, this Court should grant Yount's request for an extension.

DATED this 1st day of October, 2019.

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CERTIFICATE OF SERVICE

I certify that on October 1, 2019, I submitted the foregoing “REPLY IN SUPPORT OF ‘MOTION FOR EXTENSION TO FILE REPLY BRIEF’” for filing *via* the Court’s eFlex electronic filing system. Electronic notification will be sent to the following:

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