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Attorneys for Appellant
DERRICK POOLE

SUPREME COURT
STATE OF NEVADA

DERRICK POOLE,

Appellant,

v

NEVADA AUTO DEALERSHIP INVEST-
MENTS LLC a Nevada Limited Liability
Company d/b/a SAHARA CHRYSLER,
JEEP, DODGE, WELLS FARGO DEALER
SERVICES INC., COREPOINTE INSUR-
ANCE COMPANY, and DOES 1 through 100,
Inclusive,

Respondents,

SUPREME COURT NO: 74808
District Court Case No.: A-16-737120-C

**MOTION FOR EXTENSION
OF TIME TO FILE REPLY BRIEF**

[FIRST REQUEST]

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD :

PLEASE TAKE NOTICE, that pursuant to NRAP, Rules 26(b)(1)(A), 31(b)(3), Appellant DERRICK POOLE will move the Court to extend time in which to file Appellant's reply brief for a period of thirty (30) days.

Dated this 23rd day of August 2018

By /s/ George O. West III
 GEORGE O. WEST III
 Law Offices of George O. West III
Consumer Attorneys Against Auto Fraud
Attorney for Appellant
DERRICK POOLE

I

A PARTY MAY MOVE TO EXTEND TIME

IF GOOD CAUSE IS SHOWN

Rules 26(b)(1)(A), 31(b)(3) state in pertinent part :

Extending Time. For good cause, the court may extend the 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. But the court may not extend the time to file a notice of appeal except as provided in Rule 4(c).

Motions for Extensions of Time. A motion for extension of time for filing a brief may be made no later than the due date for the brief and must comply with the provisions of this Rule and Rule 27.

Contents of Motion. A motion for extension of time for filing a brief shall include the following:

- (i) The date when the brief is due;
- (ii) The number of extensions of time previously granted (including a 5-day telephonic extension), and if extensions were granted, the original date when the brief was due;
- (iii) Whether any previous requests for extensions of time have been denied or denied in part;
- (iv) The reasons or grounds why an extension is necessary; and
- (v) The length of the extension requested and the date on which the brief would become due.

Both Appellant and Respondent previously moved for, and received 30 day extensions on their respective briefing, which was not opposed by either party. Based on the filing date of Respondent's Answering brief, Appellant's reply brief is currently due on **September 12, 2018**. Appellant seeks a one-time 30 day extension up to and including **October 12, 2018** to file his reply brief. Appellant's counsel's professional commitments in other currently pending matters have slowed the preparation of the Reply brief, and other time sensitive matters that are due in the next two to three weeks will do the same with respect to preparing the Reply brief in this matter. Appellant's counsel seeks a 30 day extension to ensure he can adequately and thoroughly address all the new issues raised in Respondent's Answering brief.

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Dated this 23rd day of August, 2018

By /s/ George O. West III
GEORGE O. WEST III
Law Offices of George O. West III
Consumer Attorneys Against Auto Fraud
Attorney for Appellant
DERRICK POOLE

1 **PROOF OF SERVICE**

2 STATE OF NEVADA)
3 COUNTY OF CLARK)

4 On August 23rd 2018, I served the forgoing document(s) described as 1) **MOTION FOR**
5 **EXTENSION OF TIME TO FILE REPLY BRIEF** on interested party(ies) in this
6 action by either fax and/or email, or by placing a true and correct copy and/or original
7 thereof addressed as follows:

8 **JEFF BENDAVID, ESQ**
9 Moran, Brandon, Bendavid, Moran
630 South Fourth Street
Las Vegas, NV 89101
j.bendavid@moranlawfirm.com

10 [] **(BY FIRST CLASS MAIL)** I am readily familiar with the firm's practice of
11 collection and processing correspondence for mailing. Under that practice it would be
12 deposited with the U.S. Postal service on that same day with first class postage thereon
13 fully prepaid at Las Vegas, NV in the ordinary course of business.

14 [] **(BY PERSONAL SERVICE)** I delivered such envelope by hand to the office, and/or
15 to the attorney listed as the addressee below.

16 [] **(BY FAX SERVICE)** Pursuant to consent under NRCP, Rule 5(b), I hereby certify
17 that service of the aforementioned document(s) via facsimile, pursuant to EDCR Rule
18 7.26(a), as set forth herein.

19 [x] **(BY EMAIL SERVICE) (Wiznet/email)** Pursuant NRCP, Rule 5(b)(2)(D), and
20 the EDCR on electronic service, I hereby certify that service of the aforementioned
21 document(s) via email to pursuant to the relevant and pertinent provisions of EDCR and
22 NRCP, as set forth herein.

23 Executed on this 23rd day of August, 2018

24 /s/ George O. West III
25 GEORGE O. WEST III
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