

IN THE SUPREME COURT OF THE STATE OF NEVADA

MICHAEL KOSOR, JR., a Nevada
resident;

Appellant,

vs.

OLYMPIA COMPANIES, LLC, a
Nevada limited liability company;
GARRY V. GOETT, a Nevada resident

Respondents.

Supreme Court Case No. 75669

District Court Case No. A765257
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Elizabeth A. Brown
Clerk of Supreme Court

**MOTION TO EXTEND TIME
TO SUBMIT ANSWERING
BRIEF**

COME NOW Respondents, OLYMPIA COMPANIES, LLC, and GARRY V. GOETT, by and through counsel Kemp, Jones & Coulthard, LLP, and hereby move this Court for a ten-day extension of time for filing their Reply Brief. In accordance with NRAP 31(b), this request is being made before the due date of the brief. The Clerk's Office's due date for Respondents' Answering Brief is currently, Monday, April 15, 2019.

This is Respondent's second requested extension of time to file their Answering Brief. The Court previously approved a first request made by stipulation of the parties to extend the time for filing the Answering Brief to April 15, 2019, which the parties utilized to engage in additional settlement discussions. Accordingly, no prior requests have been denied or denied in part.

Under NRAP 26(b)(1), the Court may upon motion enlarge the time prescribed "to perform any act" on a showing of good cause. Unfortunately, the attorney drafting the brief, Nathanael Rulis, Esq., became ill with an upper

respiratory infection on April 5, 2019, preventing him from being able to work on and finalize the Answering Brief. Respondents' counsel has been medically advised not to return to work before April 11, 2019.

Respondents hereby request only a ten-day extension of time to complete this brief. As the drafter of the brief took ill before the brief could be timely completed, good cause exists for a ten-day extension of time. Respondents believe that an extension of time until April 25, 2019, will allow sufficient time to complete and file the Answering Brief.

Permitting Respondents' counsel additional time to prepare the Answering Brief constitutes good cause for an extension of time under NRAP 26(b) and 31(b). Respondents do not seek this extension in bad faith or to delay the proceedings. Accordingly, Respondents respectfully request that this Court extend the deadline for their Answering Brief to Thursday, April 25, 2019.

DATED this 11th day of April, 2019.

Respectfully submitted by:

KEMP, JONES & COULTHARD, LLP

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