

IN THE SUPREME COURT OF THE STATE OF NEVADA

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JENNIFER V. ABRAMS; AND THE
ABRAMS & MAYO LAW FIRM,

Appellants,

vs.

STEVE W. SANSON; VETERANS IN
POLITICS INTERNATIONAL, INC; LOUIS
C. SCHNEIDER; AND LAW OFFICES OF
LOUIS C. SCHNEIDER, LLC

Respondents.

S.C. NO.

D.C. NO:

Electronically Filed
7/8/18 7:58:54
Oct 15 2018 09:38 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

MOTION FOR LEAVE OF COURT TO EXCEED TYPE-VOLUME

LIMITATION OF OPENING BRIEF

Appellants, Jennifer V. Abrams and the Abrams & Mayo Law Firm, by and through their attorney of record, the WILICK LAW GROUP, respectfully requests that this Court enter an order granting their *Motion for Leave of Court to Exceed Type-Volume Limitation of Opening Brief*.

This *Motion* is based upon the Points and Authorities below, and is made in good faith.

DATED this 24 day of October, 2018.

WILLICK LAW GROUP



MARSHAL S. WILLICK, ESQ.

Nevada Bar No. 2515

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(702) 438-4100

Attorneys for Appellants

POINTS AND AUTHORITIES

NRAP 32(a)(7)(D) permits parties to seek leave of Court to extend the length of the Opening Brief, demonstrating that the complexity of the case and issues presented warrant granting the request.

The request must be filed by the time the brief is due. Pursuant to the Court's *Order* of October 1, 2018, appellants have until October 12, 2018 to file their Opening Brief.

This request is made to accommodate a brief enlarged (to some 16,000 words) by virtue of the complexity of issues that span three appellate filings, necessarily requiring extensive cross-referencing so that this Court is fully informed of the relevant facts in evaluating the case. This is a “fact-heavy” record and briefing – the

additional length is required to adequately inform this Court of those facts and to adequately explain the complexities of the legal argument.

There is no prejudice to Respondent if the length required to provide the Opening Brief is extended as requested.

DATED this 12th day of October, 2018.

WILLICK LAW GROUP

A handwritten signature in black ink, appearing to read "Marshal S. Willick", is written over a horizontal line.

MARSHAL S. WILLICK, ESQ.
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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of the WILICK LAW GROUP and that on this 12th day of October, 2018, documents entitled *Motion for Leave of Court to Exceed Type-Volume Limitation of Opening Brief* were filed electronically with the Clerk of the Nevada Supreme Court, and therefore electronic service was made in accordance with the master service list as follows, to the attorneys listed below at the address, email address, and/or facsimile number indicated below:

Maggie McLetchie, Esq.
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There is regular communication between the place of mailing and the places so addressed.



Employee of the WILICK LAW GROUP