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Elizabeth A. Brown  
Clerk of Supreme Court

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

YOAV EGOSI,

Appellant,

vs.

PATRICIA EGOSI,

Respondent.

Supreme Court Case: 76144

**MOTION TO EXTEND TIME TO  
FILE AN OPPOSITION AND  
COUNTERMOTION TO  
RESPONDENT'S MOTION TO  
DISMISS**

COMES NOW Appellant, Yoav Egosi, through his attorney Alex Ghibaud, Esq. of Alex B. Ghibaud, PC, and files the above referenced motion as follows:

**Memorandum of Points and Authorities**

. On March 6, 2019 Respondent filed a motion to dismiss this appeal, more than 6 months after this Court directed Respondent to file any response to an Order to Show Cause why the appeal should not be dismissed for the very same reasons Respondent now asks the Court to dismiss the appeal. As such, the motion is

frivolous on its face as it rehashes issues addressed when this Court issued an Order to Show Cause, more than 6 months ago.

As previously mentioned in several motions filed in this appeal (and others), undersigned counsel was hospitalized for several days from December 31 to January 3, 2019. Recovery from that illness continued through the month of March, 2019. As a result of that unforeseen and unexpected illness, undersigned was unable to timely prepare and file the opposition and countermotion contemplated in this matter.

### **Conclusion**

Undersigned counsel requests an extension of time to file the opposition and countermotion to Respondent's motion to dismiss as a sudden and serious illness requiring several months of recuperation qualifies as extraordinary and unforeseen circumstances and good cause to grant said extension of time. The opposition and countermotion is file contemporaneously with the instant motion.

DATED this 22<sup>nd</sup> day of April, 2019.

**ALEX B. GHIBAUDO, P.C.**

By: /s/ Alex B. Ghibaud, Esq.  
Alex B. Ghibaud, Esq.  
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703 S. 8<sup>th</sup> Street  
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**CERTIFICATE OF SERVICE**

I certify that in the 22<sup>nd</sup> day of April 2019, I served a true and correct copy of Appellant's *MOTION TO EXTEND TIME TO FILE AN OPPOSITION AND COUNTERMOTION TO RESPONDENT'S MOTION TO DISMISS* upon Respondent by this Court's electronic service system.

Respectfully submitted,

*/s/ Alex Ghibaud*

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