

IN THE SUPREME COURT OF THE STATE OF NEVADA

JOHN ILIESCU, JR., INDIVIDUALLY,
AND JOHN ILIESCU, JR. AND SONNIA
ILIESCU AS TRUSTEES OF THE JOHN
ILIESCU, JR. AND SONNIA ILIESCU
1992 FAMILY TRUST AGREEMENT,

No. 76146

Electronically Filed
Jan 15 2019 12:30 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Appellants,

vs.

HALE LANE PEEK DENNISON AND
HOWARD PROFESSIONAL CORPORATION,
D/B/A HALE LANE,

Respondent.

MOTION FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF

Respondent hereby moves for an additional five-day extension of time for filing the answering brief. Respondent's answering brief is now due January 16, 2019. Thus, Respondent requests an extension until January 21, 2019.

Counsel for the parties recently filed a second stipulation for the extension requested, but the stipulation was denied because the second stipulation is not permissible under NRAP 31(b)(2) (allowing the parties to stipulate to an extension of time to file a brief for a total of 30 days). Counsel for Respondent inadvertently neglected to consider the 30-day limitation of that Rule, presuming instead that a stipulation was permissible for the second extension.

As evidenced by the second stipulation, Respondent and Appellant have conferred regarding the requested extension of time, and Appellant has no objection to the requested extension until January 21, 2019.

This is a complex legal malpractice case involving an underlying district court action that was litigated for over 8 years and included a previous appeal. Counsel has been working diligently on the answering brief, but despite his best efforts he will not be able to complete the brief by the current deadline.

Accordingly, respondent requests a brief five-day extension until January 21, 2019, for the answering brief. This request is being made in good faith without the intent to delay this appeal unnecessarily.

DATED: January 15, 2019.



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CERTIFICATE OF SERVICE

Pursuant to NRAP 25, I hereby certify that I am an employee of the law office of Lemons, Grundy & Eisenberg and that on January 15, 2019, I e-filed a true and correct copy of the foregoing **MOTION FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF**, with the Clerk of the Nevada Supreme Court through the Court's electronic filing system and notice will be sent electronically by the Court to the following:

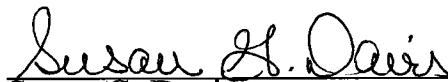
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