1 IN THE SUPREME COURT OF THE STATE OF NEVADA 2 Electronically Filed 3 IN THE MATTER OF THE No.: 76831 Mar 12 2019 09:19 a.m. VISITATION OF THE PERSONS OF: Elizabeth A. Brown MOTION FOR FATENSION FOR Court J. C. B.; K. R. B.; L. B. B.; and L. A. B., 4 MINORS. TIME TO FILE REPLY BRIEF 5 PAULA BLOUNT, 6 7 Appellant, 8 VS. 9 JUSTIN CRAIG BLOUNT, 10 Respondent. 11 Appellant, by and through counsel, F. Peter James, Esq., hereby moves this 12 Honorable Court for a standard telephonic extension of time to file the Reply 13 Brief. Dated this 11th day of March, 2019 14 15 /s/ F. Peter James 16 LAW OFFICES OF F. PETER JAMES F. Peter James, Esq. 17 Nevada Bar No. 10091 3821 W. Charleston Blvd., Suite 250 18 Las Vegas, Nevada 89102 702-256-0087 19 Counsel for Appellant 20 ///

POINTS AND AUTHORITIES

Requests for relief must be made by motion absent another way prescribed by rule. *See* NRAP 27(a)(1). Generally, a request for an extension of time to file a document must be made before the deadline has passed. *See* NRAP 31(b)(3). For good cause shown, however, the Court may extend the time for filing a brief even after the deadline has passed. *See* NRAP 26(b)(1)(A). A telephonic extension of two weeks (14 days) is given for good cause shown. *See* NRAP 26(b)(1)(B).

Here, counsel was going to request an extension of time telephonically; however, counsel was inundated with quasi-emergency client requests, calls from other counsel, and administrative matters (counsel is a sole practitioner managing his own office) which caused counsel to not be able to call the Clerk for the extension during business hours.

The basis for the request for an extension is counsel's schedule. Counsel has been handling his late-mother-in-law's passing, counsel moved residences this last week, and counsel attended the Family Law Convention a week and a half ago—all in the middle of moving, handing his late-mother-in-law's affairs, and handling a busy law practice.

Counsel is requesting what would have been the telephonic extension request of 14 days.

1	CONCLUSION
2	Accordingly, Appellant, through counsel, respectfully requests that the
3	Court grant what would have been the telephonic request for an extension.
4	Dated this 11 th day of March, 2019
5	/s/ F. Peter James
6	LAW OFFICES OF F. PETER JAMES
7	F. Peter James, Esq. Nevada Bar No. 10091
8	3821 W. Charleston Blvd., Suite 250 Las Vegas, Nevada 89102
9	702-256-0087 Counsel for Appellant
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	

CERTIFICATE OF SERVICE

The following are listed on the Master Service List and are served via the	ıe
Court's electronic filing and service system (eFlex):	

Bradley Hofland, Esq. Counsel for Respondent