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Apr 01 2019 06:31 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

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

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9 In the Matter of the Colman Family Revocable  
10 Living Trust date June 23, 2011,  
11 A Non-Testamentary Trust.

Case No.: 76950

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16 **MOTION TO ENLARGE TIME TO FILE APPELLANT'S OPENING BRIEF AND**  
17 **APPENDIX**  
18 **(Second Request)**

19 **COMES NOW** Appellant, Paul V. Colman, by and through his attorney, Thomas C.  
20 Michaelides, Esq., TCM Law, moves this Court for an Order enlarging the time of fourteen (14)  
21 days from April 2, 2019, within which he may file his Opening Brief and Appendix presently  
22 scheduled to be filed on or before April 2, 2019.

23 This Motion is brought pursuant to NRAP 26(b)(1)(A) on the grounds that good cause exists to  
24 enlarge the time to file the Opening Brief and Appendix. Is based on this motion, the  
25 attached Memorandum of Points and Authorities and Declaration of Thomas C. Michaelides, and the  
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1 papers and pleadings on file and on such other oral or documentary evidence that may be presented.

2 DATED: April 1, 2019

TCM LAW

3 By: /s/ Thomas C. Michaelides  
4 THOMAS C. MICHAELIDES, ESQ.  
5 Nevada Bar No. 5425  
6 2620 Regatta Dr., #219  
7 Las Vegas, Nevada 89128  
8 Attorneys for Appellant

9 **MEMORANDUM OF POINTS AND AUTHORITIES**

10 **I.**

11 **GOOD CAUSE EXISTS TO ENLARGE TIME**  
12 **TO FILE FAST TRACK STATEMENT AND APPENDIX**

13 NRAP 26(b)(1)(A) provides in relevant part:

14 For good cause, the court may extend the time prescribed  
15 by these Rules or by its order to perform any act, or may  
16 permit an act to be done after that time expires.....

17 I, THOMAS C. MICHAELIDES, am the attorney representing appellant PAUL V.

18 COLMAN in the above-captioned case. The appellant is requesting an additional fourteen (14) days  
19 extension of time in which to file its Opening Brief and Appendix under NRAP 26(b)(1)(A).

20 Appellant requests the extension of time due to extenuating circumstances. Samantha  
21 Almazan has been in undersigns employ in excess of three years as the lead paralegal. While the  
22 legal portion of the Opening Brief has been researched and a draft has been written, we rely on Ms.  
23 Almazan to handle the tasks of putting the brief into proper form and ensuring the number of copies  
24 have been successfully sent and all other rules dealing with form are followed.

25 Approximately last Wednesday Ms. Almazan, became very ill. Counsel sent her home  
26 around 3 p.m. She called in sick to work both Thursday and Friday, stating that she was in pain as a  
27 result of her back and stomach area. Today, Monday April 1, 2019, Samantha's mother Pearl, called  
28 into the office and said that Samantha was admitted to the hospital with issues to her kidneys as a

1 result of their failure. She was admitted to the Henderson Medical Center. It appears as if Samantha  
2 might be in the hospital for the foreseeable future.

3 Samantha has been the lead paralegal on this case since our Mr. Colman retained our firm in  
4 November 2017. In addition, Ms. Almazan has continued to handle all of the appellate work in the  
5 office, including Mr. Colman's case. Currently, as she is in Henderson Hospital in renal failure. Her  
6 health outcome at this time is unknown and they are still running tests. In an effort to maintain  
7 consistency in the above-captioned case, Ms. Almazan was the only paralegal preparing documents  
8 and performing research in the above-captioned case. The undersigned is attempting to fill this  
9 position temporarily with very capable paralegals until the firm has more information about the  
10 outcome of Ms. Almazan's condition. As such, undersigned is requesting this extension in time to  
11 allow the new paralegal to get up to speed in the case and to assist with the filing of the opening  
12 brief. If required, undersigned can request Ms. Almazan entire medical records from the hospital to  
13 document her treatment and condition.  
14  
15

### 16 CONCLUSION

17 Therefore, it is respectfully submitted that good cause exists to enlarge the time for filing the  
18 Opening Brief and Appendix to and including April 16, 2019.

19 DATED: April 1, 2019

/s/ Thomas C. Michaelides

THOMAS C. MICHAELIDES, ESQ.

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Las Vegas, NV 89128

(702) 462-6161

Attorney for Appellant

### 26 DECLARATION OF THOMAS C. MICHAELIDES

27 THOMAS C. MICHAELIDES, declares as follows:  
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1. I am an attorney at law licensed to practice before all the courts of the State of Nevada. I am the attorney for Paul V. Colman, Appellant herein. All of the facts set forth herein are true of my own personal knowledge. If called to testify, I could and would testify to them.

2. I have read the foregoing Motion to Enlarge Time and know the contents thereof. I have read all of the factual statements and contentions.

3. This is the first request made for an enlargement of time within which to file the Opening Brief and Appendix. I feel confident that I will be able to complete the Opening Brief and Appendix on or before April 16, 2019.

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Executed this 1<sup>st</sup> day of April 2019 at Las Vegas, Nevada.

/s/ Thomas C. Michaelides  
THOMAS C. MICHAELIDES

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