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Dec 14 2017 10:56 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

IN THE SUPREME COURT OF THE STATE OF NEVADA

17 WYNN LAS VEGAS, LLC d/b/a
18 WYNN LAS VEGAS,

Appellant/Respondent,

19 vs.

20 YVONNE O'CONNELL, an individual,

Respondent/Appellant.

Supreme Court Case No.: 70583(L)
Consolidated with Case No.: 71789

Eighth Jud. Dist. Ct.
Case No.: A-12-655992-C

UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO FILE
RESPONDENT/APPELLANT'S REPLY BRIEF
(Second Request; First Request via Motion)

25 COMES NOW, Respondent/Appellant YVONNE O'CONNELL
26 ("O'CONNELL"), by and through Christian M. Morris, Esq., of the NETTLES
27 LAW FIRM hereby submits the instant *Unopposed Motion for an Extension of*
28

1 *Time to File Respondent/Appellant's Reply Brief* (“Motion”) pursuant to NRAP 26,
2 27, and 31 for this Court’s consideration.

3
4 **INFORMATION REQUIRED BY NRAP 31(b)(3)**

5 **A. The date O’CONNELL’s Reply Brief is currently due.**

6 Respondent/Appellant’s Reply Brief is currently due December 18, 2017.

7
8 See Stipulation for Extension of Time to File Respondent/Appellant's Reply Brief
9 on Cross-Appeal filed 11/06/2017 (doc. no. 17-38004) and *Notice*
10 *Motion/Stipulation Approved* (17-38013).

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12 **B. The number of previous extensions granted, and the original date when**
13 **O’CONNELL’s Reply Brief was due.**

14 O’CONNELL has previously received one (1) extension by stipulation of
15 the parties with the approval of this Court. See doc. nos. 17-38004 and 17-38013

16
17 **C. Whether any previous requests for extension have been denied, or**
18 **denied in part.**

19 No previous requests for extension have been denied, or denied in part.

20
21 **D. The reasons or grounds why an extension is necessary.**

22 NRAP 31(b)(3) permits a party to seek an extension of time “upon a clear
23 showing of good cause.”

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25 1. Undersigned counsel has been conscientiously preparing
26 O’CONNELL’s Reply Brief, however additional time is needed for its completion
27 as set forth herein.
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2. O'CONNELL's trial counsel Ms. Christian M. Morris, Esq., recently gave birth prematurely to a son who is currently hospitalized and was thus out of the office and not available for assistance regarding this appeal.

3. The requested extension will also allow the additional time needed for the Client to review the final draft of the reply brief per her request and input.

4. Lastly, undersigned counsel has confirmed with counsel for Appellant/Respondent WYNN LAS VEGAS, LLC, that they have no objection to the requested extension.

O'CONNELL respectfully submits that the foregoing demonstrates the requisite 'good cause,' is submitted in good faith and not for purposes of delay, and will not prejudice the parties or the eventual disposition of these combined appeals considering the short length of the requested extension.

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E. The length of the requested extension and the date on which when O’CONNELL’s Reply Brief would become due.

O’CONNELL requests an extension of time until January 8, 2018, which is a twenty-one (21) calendar day extension (12 judicial days) of time from its current deadline of December 18, 2017.

Dated this 14th day of December, 2017

NETTLES LAW FIRM

/s/ Christian M. Morris
BRIAN D. NETTLES, ESQ.
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CERTIFICATE OF SERVICE

I certify that on the 14th day of December, 2017, I electronically filed the foregoing with the Supreme Court of Nevada by using the Court’s eFlex electronic filing system to the following parties.

Lawrence J. Semenza, III, Esq.
Christopher D. Kircher, Esq.
Jarrod L. Rickard, Esq.
SEMENZA KIRCHER RICKARD
Attorneys for Appellant/Respondent
WYNN LAS VEGAS, LLC d/b/a WYNN LAS VEGAS

/s/ Jenn Alexy
An employee of the NETTLES LAW FIRM