

IN THE SUPREME COURT OF THE STATE OF NEVADA

EDGEWORTH FAMILY TRUST; AND
AMERICAN GRATING, LLC

Appellants/Cross-Respondents,
vs.

DANIEL S. SIMON; AND THE LAW
OFFICE OF DANIEL S. SIMON, A
PROFESSIONAL CORPORATION,

Respondents/Cross-Appellants.

EDGEWORTH FAMILY TRUST; AND
AMERICAN GRATING, LLC,

Appellants,
vs.

DANIEL S. SIMON; AND THE LAW
OFFICE OF DANIEL S. SIMON, A
PROFESSIONAL CORPORATION

Respondents.

THE LAW OFFICE OF DANIEL
S. SIMON,

Petitioner,
vs.

THE EIGHTH JUDICIAL DISTRICT
COURT OF THE STATE OF NEVADA,
IN AND FOR THE COUNTY OF CLARK;
AND THE HONORABLE TIERRA
DANIELLE JONES, DISTRICT JUDGE,

Respondents,
and

NO. 77678

Electronically Filed
Dec 11 2019 10:40 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

NO. 78176

NO. 79821

EDGEWORTH FAMILY TRUST; AND
AMERICAN GRATING, LLC,

Real Parties in Interest.

**MOTION FOR EXTENSION OF TIME FOR FILING OF COMBINED
ANSWERING BRIEF ON APPEAL AND OPENING BRIEF ON
CROSS-APPEAL**

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Attorney for Law Office of Daniel S. Simon and Daniel S. Simon

The Law Office of Daniel S. Simon and Daniel S. Simon (hereinafter “Simon”) hereby moves for a 30-day extension of time for filing the Combined Answering Brief on Appeal and Opening Brief on Cross-Appeal.

Pursuant to NRAP 26(b), Simon requests an extension of time from December 16, 2019, up to and including January 15, 2020, (30 days) in which to file their Combined Answering Brief on Appeal and Opening Brief on Cross-Appeal. Simon has been diligently working on preparation of the brief, but due to the issues presented, the voluminous appendix and the holidays, Simon requires additional time in order to complete the brief. This request is not an attempt to delay or prolong the appellate proceedings and will not cause undue delay.

Therefore, the Combined Answering Brief on Appeal and Opening Brief on Cross-Appeal would then be due on or before January 15, 2020. As such, Petitioners’ respectfully request that their motion be granted.

Dated this 11th day of December 2019.

/s/ James R. Christensen
JAMES R CHRISTENSEN, ESQ.
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 11th day of December 2019, I served a copy of the foregoing MOTION FOR EXTENSION OF TIME FOR FILING OF COMBINED ANSWERING BRIEF ON APPEAL AND OPENING BRIEF ON CROSS-APPEAL electronically to all registered parties.

/s/ Dawn Christensen
an employee of JAMES R. CHRISTENSEN