

IN THE SUPREME COURT OF THE STATE OF NEVADA

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EDGEWORTH FAMILY TRUST; AMERICAN  
GRATING, LLC,

Appellants,

vs.

DANIEL S. SIMON; THE LAW OFFICE OF  
DANIEL S. SIMON, A PROFESSIONAL  
CORPORATION; DOES I through X, inclusive,  
and ROE CORPORATIONS I through X,  
inclusive,

Respondents.

Electronically Filed  
Case Nos.: 77678 and 2019-27875  
Jun 28 2019 10:04 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**MOTION FOR EXTENSION OF TIME FOR FILING OF OPENING BRIEF**

Appellants hereby move for a 30-day extension of time for filing the opening brief. The brief is currently due for filing on July 2, 2019. Therefore, Appellants request an extension until August 1, 2019. This is Appellants first request for an extension of time for filing the opening brief.

This is a consolidated appeal from orders entered by Judge Tierra Jones that, among other things, awarded Respondents an additional \$484,982.50 in attorneys fess, found that Appellants constructively discharged Respondents, summarily dismissed Appellants' Amended Complaint without allowing discovery, and awarded Respondents \$50,000 in fees and \$5,000 in costs following the dismissal of the Amended Complaint, primarily for the claim of conversion. Numerous motions and appearances preceded the orders, including an evidentiary hearing conducted over a period of five days. Motions were also briefed, filed, and heard following the multi-day evidentiary hearing.

1 The Appeal involves several issues of fact and law that have required extensive research  
2 and analysis. Large measures of Appellants' arguments on appeal are contextual and fact-specific  
3 in nature, and forming the arguments has required counsel to search and review the entire record to  
4 make certain that the correct and complete context of the statements and arguments can be fully  
5 and accurately brought before this court. Along those lines, transcripts of the proceedings were  
6 ordered on April 12, 2019. However, they were not filed until June 13, 2019. This delay impacted  
7 Appellants ability to prepare their opening brief in accordance with the timeline established by the  
8 rules.

10 From the time that Appellants received the transcripts, counsel has been diligently reading  
11 the transcripts and the record to prepare the opening brief. Because of the nature of the issues  
12 presented, together with the significant number of documents and arguments on appeal, Appellants  
13 need a 30-day extension until Thursday, August 1, 2019, in which to prepare, file, and serve the  
14 opening brief and appendix. This request is made in good faith and without the intent to cause  
15 undue delay in the appeal.

17 DATED this 28<sup>th</sup> day of June, 2019.

19 VANNAH & VANNAH

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21 ROBERT D. VANNAH, ESQ.

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**CERTIFICATE OF SERVICE**

I hereby certify that the following parties are to be served as follows:

Electronically:

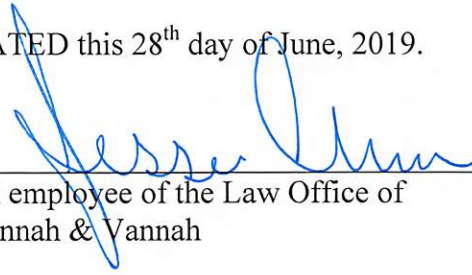
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Traditional Manner:

*None*

DATED this 28<sup>th</sup> day of June, 2019.

  
An employee of the Law Office of  
Vannah & Vannah