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Electronically Filed
Aug 05 2019 07:45 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

SUPREME COURT
STATE OF NEVADA

TRISHA KUPTZ-BLINKINSOP,)
)
)
Appellant,)
)
v)
)
THOMAS BLINKINSOP,)
)
Respondent)
_____)

SUPREME COURT NO : 78284
DIST CT. CASE NO : A-18-783766-C

RESPONDENT'S UNOPPOSED
MOTION FOR 30 DAY EXTENSION
OF TIME TO FILE ANSWERING
BRIEF

[FIRST REQUEST]

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD :

PLEASE TAKE NOTICE, that pursuant to NRAP, Rules 26(b)(1)(A), 31(b)(3), Respondent THOMAS BLINKINSOP will move the court to extend time in which to file Respondent's Answering brief for a period of thirty (30) days. This motion is unopposed.

I

A PARTY MAY MOVE TO EXTENT TIME

IF GOOD CAUSE IS SHOWN

Rules 26(b)(1)(A), 31(b)(3) state in pertinent part :

Extending Time. For good cause, the court may extend the time prescribed by these Rules or by its order to perform any act, or may permit an act to be done after that time expires. But the court may not extend the time to file a notice of appeal except as provided in Rule 4(c).

Motions for Extensions of Time. A motion for extension of time for filing a brief may be made no later than the due date for the brief and must comply with the provisions of this Rule and Rule 27.

Contents of Motion. A motion for extension of time for filing a brief shall include the following:

- (i) The date when the brief is due;
- (ii) The number of extensions of time previously granted (including a 5-day telephonic extension), and if extensions were granted, the original date when the brief was due;
- (iii) Whether any previous requests for extensions of time have been denied or denied in part;
- (iv) The reasons or grounds why an extension is necessary; and
- (v) The length of the extension requested and the date on which the brief would become due.

This motion is unopposed. Respondent's counsel received written confirmation from Appellant's counsel via email that Appellant would not oppose a thirty day extension. Appellant officially filed their opening brief on July 26, 2019. This would make Respondent's Answering brief due on August 26, 2019.

The grounds for seeking this extension are based upon Respondent's current professional and personal commitments throughout the next three to three and half weeks. Notwithstanding the Respondent's counsel, who is a sole practitioner, has been

1 buried in preparing motions and oppositions the past week. Respondent's counsel has
2 five (4) all day depositions and one half day deposition scheduled, all of which are
3 document intensive which must also be thoroughly prepared for, two of which are out of
4 state.

5 Respondent's counsel will be in California for two (2) full days on a personal matter
6 to take his mother in law to UCLA for special laser treatment on her left eye.
7 Furthermore, during this time frame Respondent's counsel has five appearances in
8 District Court and also has documents to prepare on numerous motion matters in
9 different cases. These include an opposition on motion for fees, reply on motion to retax
10 costs, two motions to compel, two replies on motions to compel and two motions to
11 amend.
12

13 Plaintiff's counsel is also scheduled to be attending the Consumer Attorneys
14 Association of Los Angeles Annual Convention in Las Vegas from August 29th through
15 September 1st to pick up MCLE credits. It is all day seminar every day.
16

17 Based on the aforementioned, Respondent seeks a thirty (30) day extension in
18 which to file his Answering brief, up to and including **September 24, 2019**.
19

20 Dated this 5th day of August, 2019

21 By /s/ George O. West III
22 George O. West III
23 Law Offices of George O. West III
24 Attorney for Respondent
25 **THOMAS BLINKINSOP**
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PROOF OF SERVICE

On August 5, 2019, I served the forgoing document(s) described as 1) **RESPONDENT'S UNOPPOSED MOTION FOR 30 DAY EXTENSION TO FILE ANSWERING BRIEF** on interested party(ies) in this action by placing a true and correct copy and/or original thereof enclosed in a sealed envelope addressed as follows :

BENJAMIN CHILDS
318 South Maryland Pkwy
Las Vegas, NV 89101
ben@benchilds.com

☐ **(BY FIRST CLASS MAIL)** I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal service on that same day with first class postage thereon fully prepaid at Las Vegas, NV in the ordinary course of business.

☐ **(BY PERSONAL SERVICE)** I delivered such envelope by hand to the office of the addressee.

☒ **(BY EMAIL SERVICE)** (E-Flex) Pursuant to NRCP, Rule 5(b)(2)(D), I hereby certify that service of the aforementioned document(s) via email to pursuant to EDCR Rule 7.26(a), as set forth herein.

☐ **(BY FAX SERVICE)** Pursuant to consent under NRCP, Rule 5(b), I hereby certify that service of the aforementioned document(s) via facsimile, pursuant to EDCR Rule 7.26(a), as set forth herein.

Executed on 5th day of August, 2019.

/s/ George O. West III
GEORGE O. WEST III