

GEORGE O. WEST III [SBN 7951]
Law Offices of George O. West III
10161 Park Run Drive., Suite 150
Las Vegas, NV 89145
(702) 318-6570
(702) 664-0459
Email : gowesq@cox.net

Attorneys for Respondent
THOMAS BLINKINSOP

Electronically Filed
Sep 13 2019 09:16 a.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 MOTION FOR
ADDITIONAL 30 DAY EXTENSION
OF TIME TO FILE ANSWERING
BRIEF**

[SECOND 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, through his counsel of record, will move the court to extend time in which to file Respondent's Answering brief for one additional period of thirty (30) days.

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.

Appellant's counsel did not oppose Respondent's first extension request, but does oppose this second request for extension. Appellant officially filed her opening brief on July 26, 2019. This made Respondent's Answering brief originally due on August 26, 2019. On, August 5, 2019, Respondent filed his motion for his first extension. On August 6, 2019, said motion was granted. Time was extended for Respondent to file his Answering brief up to and including September 25, 2019.

1 Respondent's counsel has **not** sat idly by and done nothing to begin the
2 preparation of the Answering brief since the previous extension was granted, and has in
3 fact been working on it in between all the other time sensitive and pressing matters
4 Respondent's counsel has had on calendar. However, looking at Respondent's counsel's
5 next two weeks, which consists of one all day out of state deposition in Phoenix Arizona,
6 in addition to five other (5) all day depositions, (which require substantial time to also
7 prepare for), in addition to the continued unabated preparation of several other motions,
8 and/or oppositions and/or replies that have needed to be prepared within the past two
9 weeks, and continuing into the next week to ten days or so, coupled with his deposition
10 scheduled, Respondent's counsel is requesting one final 30 day extension up to and
11 including **October, 25, 2019** to file his Answering brief.
12

13 Based on the aforementioned, Respondent seeks a thirty (30) day extension in
14 which to file his Answering brief, up to and including **October 25, 2019**
15

16 Dated this 13th day of September, 2019
17

18 By /s/ George O. West III
19 George O. West III
20 Law Offices of George O. West III
21 Attorney for Respondent
22 **THOMAS BLINKINSOP**
23
24
25
26
27
28

1
2
3 **PROOF OF SERVICE**

4 On September 23, 2019, I served the forgoing document(s) described as 1)
5 **RESPONDENT'S MOTION FOR ADDITIONAL 30 DAY EXTENSION TO FILE**
6 **ANSWERING BRIEF** on interested party(ies) in this action by placing a true and correct
7 copy and/or original thereof enclosed in a sealed envelope addressed as follows :

8 **BENJAMIN CHILDS**
9 318 South Maryland Pkwy
10 Las Vegas, NV 89101
11 ben@benchilds.com

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

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

18 ☒ **(BY EMAIL SERVICE)** (E-Flex) Pursuant to NRCP, Rule 5(b)(2)(D), I hereby certify
19 that service of the aforementioned document(s) via email to pursuant to EDCR Rule
20 7.26(a), as set forth herein.

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

24 Executed on this 13th day of September, 2019.

25 /s/ George O. West III
26 GEORGE O. WEST III
27
28