

1 **RPLY**

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15 *Attorneys for Respondents*

16 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

17 BETTY CHAN, et al.

18 Appellants,

19 v.

20 WAYNE WU, et al.

21 Appellees.

Case No: 78666

Dist. Ct. No. A-16-744109-C

**MOTION FOR EXTENSION OF
TIME**

22 COME NOW, Respondents Wayne Wu, Judith Sullivan, Nevada Real Estate Corp., and
23 Jerrin Chiu (hereafter “Appellees” or “Respondents”) by and through their counsel of record,
24 MICHAEL A. OLSEN, ESQ., of Blackrock Legal, LLC and hereby file this *Motion for*
25 *Extension of Time* (hereafter “Motion”).

26 In an order issued on November 14, 2019, the Court requested that the Appellants show
27 cause why their appeal should not be dismissed for lack of jurisdiction. Thereafter, Appellants
28 filed their *Plaintiffs-Appellants’ Response to Order to Show Cause and Alternative Request for*
Leave and Additional Time to Cure and Jurisdictional Defects by Stipulation, Motion or Order
in the District Court on December 16, 2019 at nearly 11 p.m. By order of this Court,
Respondents had 14 days to reply to Appellants’ response. This put Respondents on a tight

1 timeline to draft and file a reply, especially with the upcoming holidays. However, Respondent
2 finished drafting the reply on December 20, 2019. Unfortunately, due to the holidays and a
3 miscommunication regarding the deadline between the lead attorney and staff as well as the
4 office being closed for the holidays, Respondents failed to file their reply until January 2, 2020.
5 NRAP 27(1) allows for “an application for an order or other relief” to be made by motion.
6 Furthermore, pursuant to NRAP 26(b)(1)(A), this court may, for good cause, "extend the time
7 prescribed by these Rules or by its order to perform any act." Respondents present this Motion
8 requesting that the Court grant relief in the form of allowing the *Reply to Plaintiffs-Appellants’*
9 *Response to Order to Show Cause* (hereafter “Reply”) to be filed late. Respondents believe that
10 they have good cause to file late, given the recent holidays and that the Reply will be filed only a
11 few days late. Finally, Respondents have not previously requested any extensions on deadlines in
12 this matter, before today.

13 Respondents request permission to file the Reply after the deadline. The original deadline
14 was December 30, 2019. Respondent requests an extension of time to file the Reply on January
15 3, 2020.

16 Dated this 3rd day of January, 2020

17 Respectfully Submitted,

18 /s/Keith D. Routsong, Esq.
19 MICHAEL A. OLSEN, ESQ.
20 Nevada Bar No. 6076
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 3rd, 2020 the **MOTION FOR EXTENSION OF TIME** was served by depositing a copy of the same in the U.S. Mail, postage prepaid, addressed to:

R. Duane Frizell, Esq.
400 N. Stephanie St. Suite 265
Henderson, NV 89014

/S/Julian Campbell

An Employee of BLACKROCK LEGAL

