

IN THE SUPREME COURT OF THE STATE OF NEVADA

MICHAEL PATRICK LATHIGEE,

Appellant,

vs.

**BRITISH COLUMBIA
SECURITIES COMMISSION,**

Respondent.

No. 78833

Electronically Filed
Jan 11 2021 11:18 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

**MOTION FOR EXTENSION OF TIME TO FILE
APPELLANT'S PETITION FOR REHEARING
(Second Request)**

Appellant, Michael Patrick Lathigee ("Appellant"), by and through his counsel of record, John W. Muije & Associates, Claggett & Sykes Law Firm, and Riser Adkisson LLP, respectfully move this Honorable Court, pursuant to NRAP 26(b)(1)(B), for an extension of two weeks in which to file Appellant's petition for rehearing.

Appellant's petition for rehearing was originally due on December 28, 2020. This Court previously granted one telephonic extension of time to January 11, 2021. No request for additional time has been denied or denied in part. If this Court grants this request for an

extension of two weeks, Appellant's petition for rehearing will be due on Monday, January 25, 2021.

Good cause exists to grant the requested extension for the following reasons:

1. At the time this Court's decision was rendered, Appellant's counsel, John Muije, Esq., was in Elko County finishing a substantial new addition to his contemplated permanent home. Mr. Muije returned to Las Vegas from approximately December 20th through December 30th, to visit family for the holidays, and primarily to commence packing up Muije's large home incident to his relocation to Elko County.

2. Additionally, Mr. Muije had problems with U-Haul in getting a large load of possessions up to Elko County. Unloading and unpacking his possessions properly consumed much greater time than anticipated. Incident to the process, Mr. Muije also had internet and cell reception problems in Elko, which Muije hopes have been largely resolved.

3. Adding insult, to injury, upon Mr. Muije's return his Elko ranch home, he returned to discover that he had problems with his

water well and had no running water. This problem complicated everything and took time to resolve.

4. Finally, Mr. Muije was formally retained to assist on the appeal, due to his expertise in judgment law, including substantial experience with foreign judgments, on or about January 5, 2021.

5. Sadly, given the above complications, Mr. Muije has not had an adequate opportunity to review the underlying briefs and appendices, and will need approximately two weeks to do so properly.

6. This motion is submitted in good faith and for good cause shown in accordance with NRAP 26(b)(1)(B). For the foregoing reason, Appellant respectfully requests a two-week extension of time, until January 25, 2021, within which to file his petition for rehearing.

Dated this 11th day of January 2021.

JOHN W. MUIJE & ASSOCIATES



John W. Muije, Esq.

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Attorneys for Appellant,

Michael Patrick Lathigee

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S PETITION FOR REHEARING (Second Request)** was filed electronically with the Supreme Court of Nevada on the 11th day of January 2021. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Michael Patrick Lathigee – Appellant

Jay Adkisson\Riser Adkisson LLP
Micah Echols\Claggett & Sykes

British Columbia Securities – Respondent

Jennifer Braster\Naylor & Braster
John Naylor\Naylor & Braster
Matthew Pruitt\Alverson Taylor & Sanders
Kurt Bonds\Alverson Taylor & Sanders
Andrew Sharples\Naylor & Braster

I further certify that on this date I served a copy of the foregoing document via U.S. mail, postage pre-paid, to the following: N/A

/s/Fern Vitman
Fern Vitman, an employee of
John W. Muije Associates