# IN THE SUPREME COURT OF THE STATE OF NEVADA

NONA TOBIN, AS TRUSTEE OF THE	
GORDON B. HANSEN TRUST, DATED	Supreme Court <u>N</u> o. 79295
8/22/08; AND NONA TOBIN, AN	District Court Case No. 2225
INDIVIDUAL,	Elizabeth A. Brown
Appellants,	Clerk of Supreme Court
VS.	
JOEL A. STOKES; SNADRA F. STOKES,	
AS TRUSTEE OF JIMIJACK	
IRREVOCABLE TRUST; YUEN K. LEE,	
AN INDIVIDUAL, D/B/A MANAGER; F.	
BOUDRANT, LLC; SUN CITY	
ANTHEM COMMUNITY	
ASSOCIATION, INC.; AND	
NATIONSTAR MORTGAGE, LLC	
Respondents.	

# Motion to Extend Time to Respond to Order to Show Cause

COMES NOW, Appellant NONA TOBIN, by and through her attorney,

JOHN W. THOMSON, ESQ. of THOMSON LAW PC, and hereby submits this

Motion to Extend Time to File Response to Order to Show Cause. This Motion is

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based on the pleadings and papers on file with the Court, and the Points and Authorities attached.

DATED this 20<sup>th</sup> day of February 2020.

#### **THOMSON LAW PC**

/s/ John W. Thomson JOHN W. THOMSON, ESQ. Nevada Bar No. 5802 2450 St. Rose Pkwy, Ste 120 Henderson, NV 89074 Tel: 702-478-8282 Fax: 702-541-9500 Attorney for Appellant Nona Tobin, as an individual

### **MEMORANDUM OF POINTS AND AUTHORITIES**

#### I. <u>SUMMARY OF MOTION</u>

The present matter is an appeal from the eighth judicial district court. Nona Tobin filed her Notice of Appeal as an individual on December 19, 2019. The Nevada Supreme Court issued an Order to Show Cause on January 7, 2020. Ms. Tobin's response to the Order was due on February 6, 2020, and a telephonic two (2) week extension was granted. Appellant needs more time to prepare her Response to the Order to Show Cause.

## II. <u>LEGAL ARGUMENT</u>

NRAP 26(b)(1)(A) states:"(b) Extending Time. (1) By Court Order (A) 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."

This Court has discretion to extend the time for Nona Tobin to file her Response to the Order to Show Cause.

A short extension of time will not unduly burden or prejudice any of the parties. However, granting the extension of time will save this Court and Ms. Tobin time and resources. It is in the best interests of the Court, Ms. Tobin and judicial economy to have a short extension of time to file her Response.

# III. Conclusion

WHEREFORE, Appellant Nona Tobin by and through her attorney of record, John W. Thomson, respectfully asks this Court to enter an order granting her an extension of time to file her Response at the earliest by March 3, 2020.

Dated this 20<sup>th</sup> day of February 20, 2020.

THOMSON LAW PC By: <u>/s/ John W. Thomson</u> JOHN W. THOMSON, ESQ. Nevada Bar No. 5802 2450 St. Rose Parkway, Suite 120 Henderson, Nevada 89074 Attorney for Appellant Nona Tobin as an individual

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies on February 20, 2020, a true and correct copy of APPELLANT NONA TOBIN'S MOTION TO EXTEND TIME TO RESPOND TO ORDER TO SHOW CAUSE was served via the Court's Eflex

service system to the following:

Joseph Y. Hong, Esq. Hong & Hong Law Office 1980 Festival Plaza Dr., Suite 650 Las Vegas, NV 89135 Yosuphonglaw@gmail.com Attorney for Defendants Melanie Morgan, Esq. Akerman LLP 1635 Village Center Circle, Suite 200 Las Vegas, NV 89134 Melanie.morgan@akerman.com *Attorney for Defendants* 

<u>/s/ Kim Vroman</u> An employee of the Thomson Law PC