

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

2
3 NONA TOBIN, AS TRUSTEE OF THE
4 GORDON B. HANSEN TRUST, DATED
5 8/22/08,

6 Appellants,

7 vs.

8 JOEL A. STOKES; SANDRA F.
9 STOKES, AS TRUSTEE OF THE
10 JIMIACK IRREVOCABLE TRUST;
11 YUEN K. LEE, AN INDIVIDUAL,
12 D/B/A MANAGER; F. BONDURANT,
13 LLC; SUN CITY ANTHEM
14 COMMUNITY ASSOCIATION, INC.;
15 AND NATIONSTAR MORTGAGE,
16 LLC,

17 Respondents.

Case No.: 79295

Electronically Filed
May 26 2020 07:35 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

18 **FIRST MOTION TO EXTEND TIME TO FILE ANSWERING BRIEF**

19 Joseph Y. Hong, Esq.

20 State Bar No. 005995

21 HONG & HONG LAW OFFICE

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 Attorney for Respondents

*Joel A. Stokes; Sandra F. Stokes, as Trustees of the Jimijack Irrevocable Trust; Yuen
K. Lee, an individual, d/b/a Manager, F. Bondurant, LLC*

1 COME NOW Respondents, Joel A. Stokes; Sandra F. Stokes, as Trustees of the
2 Jimijack Irrevocable Trust; Yuen K. Lee, an individual, d/b/a Manager, F. Bondurant,
3 LLC (collectively **Jimijack**), by and through their respective counsel of record,
4 Joseph Y. Hong, Esq., and hereby moves this Court for an extension of time to file
5 their Answering Brief. This Motion is based on the following Memorandum of Points
6 and Authorities, and the papers and pleadings on file.
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9 **MEMORANDUM OF POINTS AND AUTHORITIES**

10 Jimijack respectfully requests that the Court extend the time pursuant to
11 NRAP 26(b)(1)(B) and/or 31(b)(3) to file its Answering Brief due to the good cause
12 and extraordinary circumstances and extreme need related to the COVID-19 virus
13 pandemic. Because of the COVID-19 virus pandemic, Jimijack's counsel is
14 continuing to work remotely/off-site and out of the state, and assisting in the care of
15 his elderly family members. Thus, by working remotely/off-site and out of state,
16 Jimijack's counsel has very limited access to the necessary tools and resources to
17 prepare the Answering Brief. The Answering Brief is currently due on or before June
18 1, 2020. Jimijack has not obtained any previous extensions. Thus, this is Jimijack's
19 first request for an extension of time to file its Answering Brief.
20

21 Jimijack, therefore, respectfully requests an extension of 30 days to file its
22 Answering Brief.
23

24 **I. Legal Analysis**

25 Jimijack respectfully requests an extension for 30 days to file its Answering

1 Brief pursuant to NRAP 26(b)(1)(B) and/or 31(b)(3). The requested extension will
2 not materially delay resolution of this case and Jimijack does not anticipate requesting
3 any further extensions.

4
5 **II. Conclusion**

6 In light of the foregoing, Jimijack respectfully requests a 30-day extension up to
7 and including, Wednesday July 1, 2020, to file its Answering Brief. This request is
8 made in good faith and not for delay.

9 DATED this 26th day of May, 2020.

10 HONG & HONG LAW OFFICE

11
12 */s/ Joseph Y. Hong*

13 JOSEPH Y. HONG, ESQ.

14 State Bar No. 005995

15 1980 Festival Plaza Drive, Suite 650

16 Las Vegas, Nevada 89135

17 Attorney for Respondents

18 *Joel A. Stokes; Sandra F. Stokes, as*

19 *Trustees of the Jimijack Irrevocable*

20 *Trust; Yuen K. Lee, an individual, d/b/a*

21 *Manager, F. Bondurant, LLC*

1 **CERTIFICATE OF SERVICE**

2 I certify that I am an employee of Joseph Y. Hong, Esq., and on this 26th day of
3 May, 2020, I served the foregoing **FIRST MOTION TO EXTEND TIME TO FILE**
4 **ANSWERING BRIEF** by electronic transmission through the Court’s electronic
5 filing system upon each party in this case who is registered and listed as an electronic
6 case filing user with the Clerk.
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9 By: /s/ Debra L. Batesel
10 An employee of Joseph Y. Hong, Esq.
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