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Electronically Filed  
Aug 30 2019 03:42 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

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

SUPERPUMPER, INC., an Arizona corporation; EDWARD BAYUK, individually and as Trustee of the EDWARD BAYUK LIVING TRUST; SALVATORE MORABITO, an individual; and SNOWSHOE PETROLEUM, INC., a New York corporation,

Appellants,

vs.

WILLIAM A. LEONARD, Trustee for the Bankruptcy Estate of Paul Anthony Morabito,

Respondent.

Case No.: 79355

**RESPONDENT'S MOTION TO  
EXCEED PAGE LIMIT FOR  
THE OPPOSITION TO  
APPELLANTS' EMERGENCY  
MOTION FOR STAY RELIEF**

Respondent, William A. Leonard, in his capacity as Trustee for the Bankruptcy Estate of Paul Anthony Morabito, by and through his counsel, the law firm of Garman Turner Gordon LLP, files this motion to exceed the page limit for Respondent's Opposition to Appellants' Emergency Motion for Stay Relief (the "Opposition"), pursuant to NRAP 32(a)(7)

NRAP 27(d)(2) limits a motion to 10 pages. However, NRAP 32(a)(7) allows a party to exceed the page limit with permission of the Court and "upon a showing of diligence and good cause." NRAP 32(a)(7) additionally allows a brief to comply with either a page limitation of 30 pages or a word-count limitation of 14,000 words, which is the equivalent of approximately 467 words per page. Thus, if the same rule is applied to motions, a motion would be compliant if it contained 4,667 words or less. The Opposition contains 19 pages and 4339 words of text, which would be compliant under an equivalent word-count limitation to the page-count limitation of 10 pages.

Good cause exists to allow the Opposition to exceed the page limit, as set forth below:

**DECLARATION OF STEPHEN A. DAVIS, ESQ. IN SUPPORT OF  
RESPONDENT'S MOTION TO EXCEED PAGE LIMIT FOR  
OPPOSITION TO APPELLANTS' EMERGENCY MOTION FOR STAY  
RELIEF**

I, Stephen A. Davis, Esq, declare as follows:

1. I am over the age of eighteen (18) years and competent to testify on the matters set forth herein. At all relevant times, I am and have been an attorney with the law firm of Garman Turner Gordon, LLP, counsel for Respondent. In such capacity, I have direct and personal knowledge of the matters set forth herein and know them to be true, except when stated on information and belief, which I believe to be true. I make this declaration in support of Respondent's Motion to Exceed Page Limits for the Opposition to Appellants' Emergency Motion for Stay Relief (the "Opposition").

2. Appellants' Emergency Motion for Stay Relief (the "Motion") exceeds the page limit as set forth in NRAP 27(d)(2). The Motion raises numerous issues that necessarily require a substantive response.

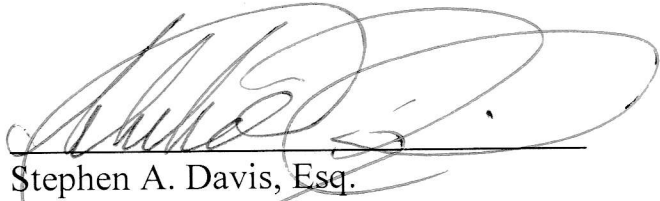
3. The Opposition consists of 19 pages and 4339 words, which exceeds the page limitation by 9 pages, but would otherwise be compliant under a similar word-count limitation as provided by NRAP 32(a)(7).

4. I have thoroughly edited the Opposition to be as concise and cogent as possible. However, the additional 9 pages are needed to adequately argue against the issues Appellants present in their Motion. Further editing would require the elimination of arguments that are necessary to oppose the Motion.

5. Thus, based upon good cause, Respondent request the Court extend the page limit of the Opposition and allow it to be filed.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 30, 2019.



Stephen A. Davis, Esq.

Therefore, for diligence and good cause shown, and according to NRAP 32(a)(7), this Court should allow Respondent to file his Opposition to Appellants' Emergency Motion for Stay Relief, which exceeds the page limitations set forth by NRAP 27(d)(2).

Dated: August 30, 2019.

GARMAN TURNER GORDON LLP



BY: \_\_\_\_\_

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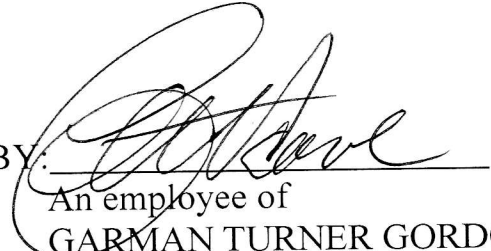
**CERTIFICATE OF SERVICE**

This is to certify that on August 30, 2019, a true and correct copy of the foregoing **RESPONDENT'S MOTION TO EXCEED PAGE LIMIT FOR OPPOSITION TO APPELLANTS' EMERGENCY MOTION FOR STAY RELIEF** was served on the following by United States Mail, first class, and by the Supreme Court Electronic Filing System:

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