

**Micah S. Echols, Esq.**  
Nevada Bar No. 8437  
CLAGGETT & SYKES LAW FIRM  
4101 Meadows Lane, Suite 100  
Las Vegas, Nevada 89107  
(702) 655-2346 – Telephone  
(702) 655-3763 – Facsimile  
[micah@claggettlaw.com](mailto:micah@claggettlaw.com)  
*Attorneys for Appellants*

Electronically Filed  
Jul 06 2020 11:01 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,

v.

WILLIAM A. LEONARD, TRUSTEE FOR THE BANRUPTCY ESTATE OF PAUL ANTHONY MORABITO,

Respondent.

Case No.: 79355

**MOTION FOR EXTENSION OF TIME TO FILE**  
**APPELLANTS' OPENING BRIEF**  
**(Fourth Request)**

Appellants, Superpumper, Inc.; Edward Bayuk, individually and as Trustee of the Edward Bayuk Living Trust; Salvatore Morabito; and Snowshoe Petroleum, Inc. (“Appellants”), by and through their counsel of record, Micah S. Echols, Esq. of Claggett & Sykes Law Firm, hereby move this Honorable Court for an extension of four days to file Appellants’ opening brief.

Appellants’ opening brief was originally due January 29, 2020. This Court previously granted a third extension of time to July 6, 2020. No request for additional time has been denied or denied in part. If this Court grants this request for an extension of four days, Appellant’s opening brief will be due on Friday, July 10, 2020. Good cause exists for allowing Appellants’ to extend the filing deadline until July 10, 2020:

1. Appellants’ counsel at Claggett & Sykes has an appellate team that has been sick for a few days and quarantined at home. In addition, Mr. Echols’ youngest daughter was taken to the ER for a severe ear infection involving displaced ear tubes. These two unforeseen events delayed the preparation of not only this opening brief but other deadlines.

2. Counsel’s IT department conducted a major maintenance session that took the server offline over the last couple of days. Unfortunately, Appellants’ counsel was unable to remotely log in to the office workstation during this period.

3. Despite these setbacks, Appellants' counsel has worked diligently to meet the current deadline to file and serve Appellants' opening brief. However, this unexpected illness amongst counsel's team, visit to the ER, and IT update have caused an unforeseen delay. Given the complex nature and numerous issues raised by this appeal, it is vital that Appellants have sufficient time to review the opening brief prior to filing.

This motion is submitted in good faith and for good cause shown in accordance with NRAP 31(b). Therefore, Appellants' respectfully request that this Court grant this motion for an extension of four days to file and serve the opening brief, until July 10, 2020.

DATED this 6th day of July, 2020.

CLAGGETT & SYKES LAW FIRM

By /s/ Micah S. Echols  
Micah S. Echols, Esq.  
Nevada Bar No. 8437  
4101 Meadows Lane, Suite 100  
Las Vegas, Nevada 89107  
*Attorneys for Appellants*

## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing: **MOTION FOR EXTENSION OF TIME TO FILE APPELLANTS' OPENING BRIEF (FOURTH REQUEST)**, was filed electronically with the Supreme Court of Nevada on the 6th day of July, 2020. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Stephen Davis, Esq.  
Gabrielle Hamm, Esq.  
Michael Lehnert, Esq.  
Gerald Gordon, Esq.  
Frank Gilmore, Esq.  
Teresa Pilatowicz, Esq.  
Jeffrey Hartman, Esq.  
Erika Pike Turner, Esq.

/s/ Anna Gresl

Anna Gresl, an employee of  
Claggett & Sykes Law Firm