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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

MOTION FOR EXTENSION OF TIME TO FILE
APPELLANTS' REPLY BRIEF
(First 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 moves this Honorable Court pursuant to NRAP 31(b) for an extension of 30 days to file Appellants’ reply brief.

Appellants’ reply brief was originally due on September 26, 2020. No request for additional time has been denied or denied in part. If this Court grants this request for an extension of time of 30 days, the reply brief will be due on Monday, December 14, 2020.

Appellants filed a motion to strike Respondent’s amended appendix and to either strike or disregard the arguments in the answering brief referencing the documents in the appendix.

On October 14, 2020, this Court denied Appellants’ motion to strike. Within this order, the Court also ordered Appellants’ reply brief to be filed within 30 days.

On November 10, 2020, Governor Sisolak held a COVID-19 press conference notifying Nevadans that for the next two week he is implementing a “Stay-at-Home 2.0” order, which urges people to stay

home as much as possible and for businesses to have employees tele-work as much as possible. That evening, in light of Governor Sisolak's order, the management at Claggett & Sykes ordered everyone to work from home for at least the next two weeks.

Despite this setback, Mr. Echols has worked diligently towards meeting the filing deadlines. However, this abrupt transition has caused delays in completing Appellants' reply brief, due to the time lost transitioning remotely, the loss of full workstations, and the team collaborating on this case now being separated.

Aside from his normal caseload, Mr. Echols was also recently retained in a Federal District Court civil rights case (*Herndon v. City of Henderson*, 2:19-cv-00018-GMN-NJK) currently in the dispositive motion/pretrial stage with numerous immediate deadlines.

For the foregoing reasons, Appellants respectfully request a 30-day extension of time, up to and including December 14, 2020, within which to file and serve their reply brief.

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This motion is submitted in good faith and for good cause shown in accordance with NRAP 31(b).

Dated this 13th day of November 2020.

CLAGGETT & SYKES LAW FIRM

/s/ Micah S. Echols

Micah S. Echols
Nevada Bar No. 8437
Attorneys for Appellants

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE APPELLANTS' REPLY BRIEF (First Request)** was filed electronically with the Supreme Court of Nevada on the 13th day of November 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