

1 **EXPT**
2 **TCM LAW GROUP**
3 THOMAS C. MICHAELIDES, ESQ.
4 Nevada Bar No. 5425
5 2620 Regatta Drive, Suite 219
6 Las Vegas, Nevada 89128
7 Telephone: (702) 462-6161
8 Facsimile: (702) 413-6255
9 tcm@tcmllawgroup.com
10 *Attorney for Appellant*

Electronically Filed
Mar 19 2020 12:19 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

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

8 CRAIG TIFTEE,

9 Appellant

CASE NO: 79871

10 vs.

11 THE STATE OF NEVADA

12 Respondent.

13
14 **EX-PARTE MOTION TO EXTEND TIME FOR BRIEF AND APPENDIX**

15
16 COMES NOW, Appellant, CRAIG TIFTEE, by and through his attorney of
17 record, THOMAS C. MICHAELIDES, and moves this Honorable Court for its
18
19 Order granting his Ex-Parte Motion for the following:

- 20 1. To extend the time to file the Opening Brief and Appendix; and
21 2. For other related relief the Court deems just and proper.
22

23 ///

1 This Motion is based upon all of the pleadings and papers, the following
2 Points and Authorities.

3 DATED this 19th day of March, 2020.

4
5 /s/ Thomas C. Michaelides
6 THOMAS C. MICHAELIDES, ESQ.
7 Nevada Bar No. 5425
8 2620 Regatta Drive, Suite 219
9 Las Vegas, Nevada 89128
10 Telephone: (702) 462-6161
11 Facsimile: (702) 413-6255
12 tcm@tcmlawgroup.com
13 *Attorney for Appellant*

14 Appellant Craig Tiffie filed his Notice of Appeal with the District Court
15 on October 16th, 2019. This appeal was in response to the Order denying the
16 sealing of records handed down by the District Court.

17 Appellant's opening brief and appendix was due to be filed on March 18th,
18 2020. Appellant's counsel had calendared the due date as March 19th, 2020.
19 Counsel for appellant called the Court to ask for a courtesy extension of two
20 weeks on March 19th, 2020 and this is when they were informed the Brief was
21 due yesterday and the extension would have to requested by motion. This is the
22 first request for extension made by Appellant.

23 On motion and upon such terms as are just, the court may relieve a party or
24 his legal representative from a final judgment, order, or proceeding for the
25 following reasons:(1) mistake, inadvertence, surprise, or *excusable*
26 *neglect*;...The motion shall be made within a reasonable time, and ... not more
27
28

1 than six (6) months after the judgment, order, or proceeding was entered or
2 taken.” In this instant case, counsel feels the excusable neglect of calendaring the
3 due date one day late should allow for more time to respond.
4

5 DATED this 19th day of March, 2020.

6 TCMLAW GROUP
7

8 THOMAS C. MICHAELIDES, ESQ.
9 Nevada Bar No. 5425
10 2620 Regatta Drive, Suite 219
11 Las Vegas, Nevada 89128
12 Telephone: (702) 462-6161
13 Facsimile: (702) 413-6255
14 tcm@tcmlawgroup.com
15 *Attorney for Appellant*
16
17
18
19
20
21
22
23
24
25
26
27
28