

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

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3           RAJWANT KAUR,

4                   Appellant / Cross-Respondent

5           vs.

6           JASWINDER SINGH,

7                   Respondent / Cross-Appellant

No.: 80090

Electronically Filed  
Jul 15 2020 06:31 p.m.

Elizabeth A. Brown  
Clerk of Supreme Court

**MOTION FOR EXTENSION OF  
TIME TO FILE REPLY BRIEF  
(First Written Request)  
(Telephonic Request Granted)**

8           Respondent / Cross Appellant, Jaswinder Singh, by and through his  
9           counsel, F. Peter James, Esq., hereby moves this Honorable Court for a very brief  
10          extension of time to file the Reply Brief.

11                                   **POINTS AND AUTHORITIES**

12          Respondent respectfully requests a very brief extension of time to file the  
13          Reply Brief. Requests for relief must be made by motion absent another way  
14          prescribed by rule. *See* NRAP 27(a)(1). Motions to extend briefing are not  
15          favored. *See* NRAP 31(b)(3). Generally, a request for an extension of time to  
16          file a document must be made before the deadline has passed. *See* NRAP  
17          31(b)(3).

18          Here, the request is timely as today is the deadline. A telephonic extension  
19          has already been granted. Respondent is requesting two additional days to file  
20          the Reply Brief.

1 Respondent’s Counsel (hereinafter “Counsel”) lost his legal assistant of  
2 many years due to daycare issues and needing to work from home several days a  
3 week. Counsel’s assistant had just returned to work when the school issue was  
4 announced—that schools would be two days in school, three days out (at most).  
5 Counsel’s assistant had to find other employment. So, Counsel had to interview  
6 for week (last week) and is training presently. The lack of having a legal assistant  
7 and that Counsel was interviewing and is training caused a backlog in work.  
8 Counsel has been coming in early and staying late, but Counsel needs two more  
9 days to get the present Reply Brief finished. The required trial exhibit to counter  
10 Appellant’s arguments has already been ordered and received.

11 There is little prejudice to Appellant for this extension. She waited 14.5  
12 years to file to set aside the Decree of Divorce. Waiting two more days for  
13 briefing is not prejudicial.

14 **CONCLUSION**

15 As such, Respondent requests two additional days to file the Reply Brief.

16 Dated this 15<sup>th</sup> day of July, 2020 /s/ F. Peter James

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20 Counsel for Respondent / Cross-Appellant

1 **CERTIFICATE OF SERVICE**

2 The following are listed on the Master Service List and are served via the  
3 Court's electronic filing and service system (eFlex):

4 Racheal H. Mastel, Esq.  
5 Co-Counsel for Appellant

6 I certify that on this 15<sup>th</sup> day of July, 2020, I caused the above and  
7 foregoing document to be served by placing same to be deposited for mailing in  
8 the United States Mail, in a sealed envelope upon which first class postage was  
9 prepaid in Las Vegas, Nevada to the attorney(s) / party(ies) listed below at the  
10 address(es) indicated below:

11 Andrew Kynaston, Esq.  
12 3303 Novat Street, Suite 200  
13 Las Vegas, Nevada 89129  
14 Co-Counsel for Appellant

14 By: */s/ F. Peter James*

15 \_\_\_\_\_  
16 An employee of the Law Offices of F. Peter James, Esq., PLLC  
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