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Attorneys for Appellant, Vivia Harrison

IN THE SUPREME COURT OF THE STATE OF NEVADA

VIVIA HARRISON,

Appellant,

v.

RAMPARTS INC. dba LUXOR HOTEL
& CASINO,

Respondent.

Case No.: 80167

MOTION FOR EXTENSION OF TIME TO FILE
APPELLANT'S OPENING BRIEF
(Third Request)

Appellant, Vivia Harrison (“Appellant”), by and through her counsel of record, Moss Berg Injury Lawyers and Claggett & Sykes Law Firm, hereby moves this Honorable Court for an extension of two weeks to file her opening brief.

Appellant’s opening brief was originally due on June 9, 2020. This Court previously granted a second extension of time to August 10, 2020. No request for additional time has been denied or denied in part. If this Court grants this request for an extension of two weeks, Appellant’s opening brief will be due on August 24, 2020. Pursuant to Rule 26, “[f]or good cause, the court may extend the time prescribed by these Rules or by its order to perform any act” (NRAP 26(1)(A)).

Good cause exists to grant the requested extension for the following reasons:

1. Mr. Echols has been heavily involved in both motion practice and related proceedings in New Mexico, First Judicial District in *Kelly Thurston, as Guardian ad litem of G.S., a minor child vs. Acadia Healthcare, et al.*, Case No. D-117-CV-2019-00136, a case that had approximately 70 oppositions come due on August 7, 2020. The law firms representing the plaintiff in this case did not expect the sheer quantity of motions to be filed by the defense. And, no extensions could be requested or granted in order to keep all the pretrial dates, as well as the firm trial date in October 2020.

2. The corresponding extension sought in the present motion for Appellant should permit her to fully and adequately brief the Court on the issues before the Court in this appeal.

This motion is submitted in good faith and for good cause shown in accordance with NRAP 26. For the foregoing reasons, Appellant respectfully request a two-week extension of time, until August 24, 2020, within which to file her opening brief.

DATED this 10th day of August, 2020.

CLAGGETT & SYKES LAW FIRM

By /s/ Micah S. Echols
Micah S. Echols, Esq.
4101 Meadows Lane, Suite 100
Las Vegas, Nevada 89107
*Attorneys for Appellant,
Vivia Harrison*

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE APPELLANT’S OPENING BRIEF (Third Request)** was filed electronically with the Supreme Court of Nevada on the 10th day of August, 2020. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Boyd B. Moss, Esq.
Matthew G. Pfau, Esq.
Loren S. Young, Esq.
Mark B. Bailus, Esq.

I further certify that I served a copy of this document by first class mail with sufficient postage, prepaid to the following address(es): N/A

/s/ Anna Gresl
Anna Gresl, an employee of
Claggett & Sykes Law Firm