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## IN THE SUPREME COURT OF THE STATE OF NEVADA

VIVIA HARRISON,

Appellant,

Case No.: 80167

V.

RAMPARTS INC. dba LUXOR HOTEL & CASINO,

Respondent.

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

Page 1 of 4

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 pursuant to NRAP 31(b) for an extension of two weeks to file Appellant's reply brief.

Appellant's reply brief was originally due on January 22, 2021. This Court previously granted a second extension of time to February 19, 2021. 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 reply brief will be due on Friday, March 5, 2021. 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(b)(1)(A).

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

- 1. In other filings with this Court, Mr. Echols has explained to the Court that he and his appellate team tested positive for COVID-19, along with their spouses and children. After experiencing severe illness and fatigue related to COVID-19 for several weeks, Mr. Echols and his team only returned to work full-time last week.
- 2. Furthermore, Andre Labonte, a third-year law student, who worked exclusively within the appellate division, has abruptly left his employment at Claggett & Sykes. Mr. Labonte's unforeseen departure has further shortened Mr.

Echols' schedule, given that there are currently no other attorneys or law clerks to assist with the numerous cases within the firm's appellate division.

3. Mr. Echols is sensitive to the length of these proceedings and has no intention to hinder or delay.

For the foregoing reasons, Appellant respectfully requests a two-week extension of time, until March 5, 2021, within which to file her reply brief.

Dated this 19th day of February 2021.

**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 Appellant, Vivia Harrison

## **CERTIFICATE OF SERVICE**

TO FILE APPELLANT'S REPLY BRIEF (Third Request) was filed electronically with the Supreme Court of Nevada on the 19th day of February 2021. 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