

IN THE SUPREME COURT OF THE STATE OF NEVADA

BARRY JAMES RIVES, M.D. and  
LAPAROSCOPIC SURGERY OF  
NEVADA, LLC,

Appellants/Cross-Respondents,  
vs. No.: 80271

Electronically Filed  
Apr 23 2021 02:13 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

TITINA FARRIS and PATRICK  
FARRIS,

Respondents/Cross-Appellants.

BARRY JAMES RIVES, M.D. and  
LAPAROSCOPIC SURGERY OF  
NEVADA, LLC,

Appellants,  
vs. No.: 81052

TITINA FARRIS and PATRICK  
FARRIS,

Respondents.

Appeal from the Eighth Judicial  
District Court, the Honorable  
Joanna S. Kishner Presiding

**MOTION FOR EXTENSION OF TIME TO FILE**  
**RESPONDENTS/CROSS-APPELLANTS' REPLY BRIEF ON**  
**CROSS-APPEAL**  
**(Second Request)**

Respondents/Cross-Appellants, Titina Farris and Patrick Farris  
("Respondents/Cross-Appellants"), by and through their counsel of

record, respectfully move this Honorable Court, pursuant to NRAP 31(b), for an extension of two weeks in which to file their reply brief on cross-appeal.

Respondents/Cross-Appellants' reply brief on cross-appeal was originally due on April 9, 2021. This Court previously granted one telephonic extension of time to April 23, 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, Respondents/Cross-Appellants' combined brief will be due on Friday, May 7, 2021.

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

When Appellants/Cross-Respondents filed their reply brief on appeal and answering brief on cross-appeal, Respondents/Cross-Appellants' counsel, Micah S. Echols, was in the middle of a three-week jury trial that concluded on Friday, April 9, 2021, in Clark County Nevada, District Court in *Giacalone v. MedicWest Ambulance, Inc. et al.*, Case No. A-15-714139-C.

After concluding this jury trial, Mr. Echols then presented oral argument the following week in Supreme Court Case No. 80837, *Harvest Management Sub LLC v. District Court (Morgan)*.

Furthermore, Mr. Echols is scheduled for oral argument on April 27, 2021, in the Nevada Court of Appeals, Case No. 79431-COA, *Gautum v. Bank of America, N.A.*

Due to the length of his recent jury trial, coupled with the two appellate oral arguments, Mr. Echols has been unable to complete the reply brief on cross-appeal.

For the foregoing reasons, Respondents/Cross-Appellants respectfully request a two-week extension of time, until May 7, 2021, within which to file their reply brief on cross-appeal.

Dated this 23rd day of April 2021.

CLAGGETT & SYKES LAW FIRM

/s/ Micah S. Echols

Micah S. Echols, Esq.

Nevada Bar No. 8437

*Attorneys for Respondents/Cross-Appellants, Titina Farris and Patrick Farris*

## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE RESPONDENTS/CROSS-APPELLANTS' REPLY BRIEF ON CROSS-APPEAL (Second Request)** was filed electronically with the Supreme Court of Nevada on the 23rd day of April 2021. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Kim Mandelbaum  
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Aimee Clark Newberry

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