

IN THE SUPREME COURT OF THE STATE OF NEVADA

CAPRIATI CONSTRUCTION
CORP., INC., a Nevada corporation,

Appellant,

vs.

BAHRAM YAHYAVI, an individual,

Respondent.

Case No. 80107
Electronically Filed
Oct 12 2020 04:57 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

CAPRIATI CONSTRUCTION
CORP., INC., a Nevada corporation,

Appellant,

vs.

BAHRAM YAHYAVI, an individual,

Respondent.

Case No. 80821

**RESPONDENT BAHRAM YAHYAVI'S MOTION FOR EXTENSION
OF TIME TO FILE ANSWERING BRIEF**

Respondent Bahram Yahyavi, by and through his counsel of record, Dennis M. Prince and Kevin T. Strong of PRINCE LAW GROUP, hereby moves to extend the time to file his Answering Brief by thirty (30) days, up to and including Wednesday, November 11, 2020, pursuant to NRAP 31(b)(3). The parties previously stipulated to a thirty (30) day extension on

September 10, 2020, which was approved by this Court. This Court has not previously denied any requests for extensions of time to file briefing in this matter. Respondent's Answering Brief is currently due on October 12, 2020. This is Respondent's second request for an extension.

Respondent respectfully requests a brief extension of time to complete his Answering Brief due to several unforeseen circumstances. Following the sale of Respondent's undersigned counsel's home, an inspection revealed a leak emanating from the master bathroom. After counsel retained the services of a contractor, he learned that a substantial portion of the shower in the master bathroom had to be removed and replaced. There were several other areas of the home that also needed repairs before the closing of the sale of the property. As a result, counsel was forced to take substantial time away from the office over the last two (2) weeks in September to oversee the repairs/construction and to update the buyer's real estate agent regarding the same. Although the sale of the home was finalized and recorded on October 1, 2020, the construction work to the master bathroom remains ongoing and has still required counsel's time and attention. Respondent's counsel did not and could not reasonably anticipate or foresee these circumstances.

Based on the underlying circumstances, Respondent believes good cause supports his requested extension. Accordingly, Respondent respectfully requests a thirty (30) day extension of time up to and including Wednesday, November 11, 2020 to file his Answering Brief. This request is made in good faith and not for the purpose of undue delay in the resolution of this matter.

DATED this 12th day of October, 2020

Respectfully Submitted,

PRINCE LAW GROUP

/s/ Kevin T. Strong

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that this document was filed electronically with the Supreme Court of Nevada on the 12th day of October, 2020. Electronic service of the foregoing document entitled **RESPONDENT BAHRAM YAHYAVI'S MOTION FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF** shall be made in accordance with the Master Service List as follows:

Michael K. Wall
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10080 West Alta Drive, Suite 200
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Attorney for Appellant
Capriati Construction Corp., Inc.

/s/ Kevin T. Strong _____
An Employee of PRINCE LAW GROUP