#### IN THE SUPREME COURT OF THE STATE OF NEVADA

2 JAMES PARSONS, Individually and as Special Administrator of the Estate 3 of CAROLYN LEE PARSONS; ANN-MARIE PARSONS, 4 5 Appellants, VS. 6 7 COLT'S MANUFACTURING COMPANY LLC, COLT'S DEFENSE LLC; DANIEL DEFENSE, INC.; PATRIOT ORDNANCE 8 FACTORY, INC.; FN AMERICA, LLC; 9 NOVESKE RIFLÉWORKS LLC CHRISTENSEN ARMS; LEWIS MACHINE 10 TOOL COMPANY; LWRC INTERNATIONAL LLC: DISCOUNT 11 FIREARMS AND AMMÓ LLC; DF&A HOLDINGS LLC; MAVERICK 12 INVESTMENTS LP: SPORTSMAN'S WAREHOUSE, INC.; GUNS AND 13 GUITARS, INĆ.

Respondents.

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No. 81034

Electronically Filed Jul 02 2020 02:57 p.m. Elizabeth A. Brown Clerk of Supreme Court

# APPELLANTS' MOTION FOR EXTENSION OF TIME TO FILE OPENING BRIEF (SECOND EXTENSION; FIRST BY MOTION)

Appellants, JAMES PARSONS, Individually and as Special Administrator of the Estate of CAROLYN LEE PARSONS, and ANN-MARIE PARSONS, hereby move for an extension to and including July 21, 2020 to file and serve their Opening Brief. This Motion is based upon the accompanying memorandum of points and authorities.

# MEMORANDUM OF POINTS AND AUTHORITIES

Parties may seek an extension of time for filing an Opening Brief so long as it is filed no later than the due date for the Opening Brief, complies with NRAP

- 1. Their Opening Brief was originally due on June 22, 2020.
- The Appellants herein sought and were granted, via an Order Granting
  Telephonic Extension, an automatic 14-day extension of time, to file their Opening
  Brief on July 6, 2020.
  - 3. Other than the automatic telephonic extension mentioned, no previous extension requests were denied or denied in part.
  - 4. The extension request is necessary as the Appellants need additional time to refine their arguments. The certified questions from the federal court present issues of first impression and complex issues of legal interpretation and additional time will allow the Appellants to present these issues to the best of their ability. In addition, an extension allows the Appellants to avoid working valued staff over the holiday weekend.
  - 5. The Appellants hereby request an extension, to and including July 21, 2020, within which to file and serve their Opening Brief.
  - 6. The Appellants have conferred with the lawyers for the Respondents and are informed that they do not object to an order extending the time to file an Opening Brief to July 21, 2020.
  - 7. There would be no prejudice suffered by Respondents because this is a short extension and will result in a total extension from the original due date of only 29 days. Thus, this extension is within the time period in which the parties may extend the time for filing by stipulation, pursuant to NRAP 31(b)(2).

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### **CONCLUSION** For the foregoing reasons, Appellants respectfully request that their Motion be granted and that their Opening Brief be filed on or before July 21, 2020. DATED this 2<sup>nd</sup> day of July 2020. MATTHEW L. SHARP, LTD. /s/ Matthew L. Sharp Matthew L. Sharp Nevada State Bar No. 4746 432 Ridge Street Reno, NV 89501 (775) 324-1500 Richard H. Friedman Nevada State Bar No. 12743 FRIEDMAN | RUBIN PLLP 1126 Highland Avenue Bremerton, WA 98337 (360) 782-4300 Joshua D. Koskoff (Admitted *PHV*) KOSKOFF, KOSKOFF & BIEDER, PC 350 Fairfield Ave. Bridgeport, CT 06604 (203) 336-4421 Attorneys for Plaintiffs

## CERTIFICATE OF SERVICE Pursuant to NRCP 5(b), I hereby certify that I am an employee of MATTHEW L. SHARP, LTD., and that on this date, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to: John H. Mowbray @ jmowbray@spencerfane.com Mary E. Bacon @ mbacon@spencerfane.com Loren Young @ lyoung@lgclawoffice.com Jay Joseph Schuttert @ jschuttert@efstriallaw.com Vance Bohman @ vbohman@swlaw.com Michael Nunez @ mnunez@murchisonlaw.com Ismail Amin @ iamin@talglaw.com Patrick Byrne @ pbyrne@swlaw.com DATED this $2^{nd}$ day of July 2020. /s/ Cristin B. Sharp An Employee of Matthew L. Sharp, Ltd.