

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

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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' ANSWERING BRIEF
ON APPEAL AND OPENING BRIEF ON CROSS-APPEAL
(First 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 60 days in which to file their combined answering brief on appeal and opening brief on cross-appeal.

Respondents/Cross-Appellants' combined brief is currently due on November 12, 2020. If this Court grants this request for a 60-day extension, their combined brief will be due on Monday, January 11, 2021. No request for additional time has been denied or denied in part.

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

1. This appeal involves complex legal issues. In addition to the complexity of the issues, an extension of time is justified due to the length of the trial and the size of the record, which includes a 14-day jury trial and substantial District Court filings. Appellants/Cross-Respondents' appendix consists of 31 volumes, and their opening brief totals 80 pages, which includes 10 presented issues.

2. Additionally, Respondents/Cross-Appellants will need to prepare their own appendix to address the issues in their cross-appeal, as well as some of the information that was omitted by Appellants/Cross-Respondents' appendix.

3. In order for Respondents/Cross-Appellants to properly prepare their combined brief and appendix, additional time is necessary to analyze Appellants/Cross-Respondents' opening brief and the voluminous record.

This motion is submitted in good faith and for good cause shown in accordance with NRAP 31(b). For the foregoing reason, Respondents/Cross-Appellants respectfully request a 60-day extension of time, until January 11, 2021, within which to file their combined answering brief on appeal and opening brief on cross-appeal, as well as their own appendix.

DATED this 5th day of November, 2020.

CLAGGETT & SYKES LAW FIRM

/s/ Micah S. Echols

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*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' ANSWERING BRIEF ON APPEAL AND OPENING BRIEF ON CROSS-APPEAL (First Request)** was filed electronically with the Supreme Court of Nevada on the 5th day of November, 2020. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Kim Mandelbaum
George Hand
Robert Eisenberg
Tara Clark Newberry
Kimball Jones
Jacob Leavitt
Chad Couchot
Thomas Doyle

I further certify that on this date I served a copy of the following via email:

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/s/ Anna Gresl

Anna Gresl, an employee of
Claggett & Sykes Law Firm