

1 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

2
3 ROCHELLE MEZZANO,

4 Appellant,

5 vs.

6 JOHN TOWNLEY,

7 Respondent.

No.: 81379

Electronically Filed
May 03 2021 09:32 p.m.

Elizabeth A. Brown
Clerk of Supreme Court

**MOTION TO EXTEND TIME TO
FILE REPLY BRIEF
(First Written Request; Telephonic
Extension Granted)**

8 Appellant, Rochelle Mezzano, by and through her counsel, F. Peter James,
9 Esq., who hereby moves this Honorable Court for a one-week extension of time
10 to file the Reply Brief.

11 **POINTS AND AUTHORITIES**

12 Requests for relief must be made by motion absent another way prescribed
13 by rule. *See* NRAP 27(a)(1). Motions to extend briefing are not favored. *See*
14 NRAP 31(b)(3). Generally, a request for an extension of time to file a document
15 must be made before the deadline has passed. *See* NRAP 31(b)(3). For good
16 cause shown, however, the Court may extend the time for filing a brief even after
17 the deadline has passed. *See* NRAP 26(b)(1)(A).

18 Here, the deadline to file the Reply Brief is today (May 3, 2021) as set by
19 a telephonic request / order to extend. As such, the request is timely.

1 Counsel for Respondent is requesting an extension due to emergency
2 family issues. Today, Counsel needed to collect his nieces from his brother-in-
3 law on an emergency basis and needed to handle collateral matters to this. This
4 caused delays in getting work finished.

5 Counsel is requesting a week to allow this situation to resolve itself and as
6 Counsel has two trials this week. But for those trials, Counsel would be only
7 requesting a few days; however, a week should suffice. Much of the work was
8 completed before Counsel was pulled away.

9 **CONCLUSION**

10 As such, good cause exists for the Court to grant a one-week extension to
11 file the Reply Brief.

12 Dated this 3rd day of May, 2021

13 /s/ *F. Peter James*

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CERTIFICATE OF SERVICE

The following are listed on the Master Service List and are served via the Court’s electronic filing and service system (eFlex):

- Gary Silverman, Esq.
- Michael Kattelman, Esq.
- Alexander Morey, Esq.

I certify that on this 3rd day of May, 2021, I caused the above and foregoing document to be served by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada to the attorney(s) / party(ies) listed below at the address(es) indicated below:

- Benjamin Albers, Esq.
- Kenton Karrasch, Esq.
- John Springgate, Esq.
- 500 Damonte Ranch Parkway, Suite 675
- Reno, Nevada 89521
- Co-Counsel for Respondent

By: */s/ F. Peter James*

An employee of the Law Offices of F. Peter James, Esq., PLLC