

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

IN THE MATTER OF THE ESTATE  
OF:  
DENNIS JOHN CARVER,  
DECEASED.

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COLONIAL REAL ESTATE  
PARTNERSHIP, LTD.; AND JOHN  
HOULIHAN,

Appellants,

vs.  
RHONDA MORGAN, PERSONAL  
REPRESENTATIVE OF THE ESTATE  
DENNIS JOHN CARVER,

Respondent.

**No. 81447**

Electronically Filed  
Aug 04 2021 02:43 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**MOTION FOR EXTENSION OF TIME FOR OPENING BRIEF AND  
APPENDIX**

**(Second Request)**

Appellant hereby moves for a 30-day extension of time for filing the opening brief and appendix. This is the first 30 day extension requested. Appellant did apply via telephone for a two-week extension. The brief is presently due for filing on August 5, 2021. Therefore, appellant requests an extension until September 6, 2021 (as September 5 is a Sunday).

This appeal regards whether it is appropriate to reopen probate of a decedent's estate and whether not doing so deprives appellants of their right to due process.

Appellant requested the transcript of the district court proceedings on May 21, 2021 and have not yet received that transcript. It was previously believed that the transcript was obtained but drafting the opening brief and reviewing the documents for the appendix, it was determined that this is incorrect. . Further, most of the employees of this firm have been fortunate enough to have survived through the Covid-19 pandemic, but now the firm has to deal with the pandemic-related backlog that is currently swamping it. Several other cases are getting ready to go, or have gone to trial, which has caused this case to have to be put on hold for a time. The undersigned counsel has been working to draft the opening brief, but Appellant's attorneys will be unable to complete the brief by the current deadline.

Accordingly, appellant requests an additional 30 days for the reply brief. If granted, the new due date would be September 6, 2021 (as September 5 is a Sunday). This request is being made in good faith, without the intent to delay this appeal unnecessarily.

DATED: August 4, 2021

/s/ Leo Flangas  
LEO P. FLANGAS, ESQ. (Bar No. 5637)  
Flangas Civil Law Firm, LTD  
*ATTORNEY FOR APPELLANT*

## **CERTIFICATE OF SERVICE**

I certify that on this date I electronically filed the foregoing document with the Clerk of the Nevada Supreme Court, and therefore electronic service was made in accordance with the master service list as follows:

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*Attorneys for the Estate and Rhonda Morgan*  
*Personal Representative of the Estate*

DATED: August 4, 2021

/s/Peggy Glover  
For the firm