

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

3 LAWRA KASSEE BULEN, AN

4 INDIVIDUAL,

5 Appellant,

6 vs.

7 ROB LAUER, AN INDIVIDUAL;

8 AND STEVE SANSON, AN

9 INDIVIDUAL,

10 Respondent.

Supreme Case No. 81854

District Court Case No. E-20-1807 Electronically Filed
Dec 15 2020 05:12 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

11
12 **PETITIONERS' MOTION FOR A CONTINUANCE OF TIME TO**
13 **REQUEST TRANSCRIPTS**

14 Appellants hereby move this honorable Court to allow this PETITIONERS'
15 MOTION FOR A CONTINUANCE OF TIME TO REQUEST TRANSCRIPTS, in
16 the above-named matter. The Appellants are requesting a thirty (30) day extension
17 to allow counsel for the Appellants, Mr. Phillips, to gather together the required
18 information in the above matter. Mr. Phillips requested the transcripts (see attached
19 "Exhibit A") the transcript order form filed in District Court, Dept. VIII. on the 8th
20 day of December, 2020; (See attached "Exhibit B") Email from District Court,
21 Dept. VIII Court Recorder, Jessica Kirkpatrick to Robin Tucker, Mr. Phillips Legal
22 Assistant, confirming receipt of the Transcript Request form and advising this may
23 take up to thirty (30) days to process.

24 Mr. Phillips is a solo practitioner and counsel for the Appellant was
25 diagnosed with the Covid virus. Obviously, during this period Mr. Phillips had to
26 remain quarantined and focused most of his efforts on his recovery. Further, due to
27 the complications of the global pandemic and the present situation of Mr. Phillips,
28 the staff was reduced and precautions were taken to ensure the safety of all that

1 may have come into contact with Mr. Phillips during this period. There was not
2 intent to delay the filing of the Docketing Statement or disregard the Supreme
3 Court's Order to file the Docketing Statement in a timely. Therefore, the Appellant
4 respectfully requests that this Court not enter sanctions against Appellant and allow
5 Therefore, the Appellant respectfully request that this honorable Supreme Court
6 enter an order allowing the extension to request Transcripts, in the said matter.
7 Such a health condition, while temporary, should constitute good cause allow for
8 an extension of time to request the transcripts.

9 As per NRAP RULE 26. COMPUTING AND EXTENDING TIME, The
10 Supreme Court may for good cause shown, allow extended time to the prescribed
11 rules to perform any act, after that time expires.

12 **STATUTORY AUTHORITY**

13 **RULE 31. FILING AND SERVICE OF BRIEFS.**

14
15 **(a) Time for Serving and Filing Briefs.** Unless a different briefing schedule
16 is provided by a court order in a particular case or by these or any other court
17 rules, parties shall observe the briefing schedule set forth in this Rule.
18

19 **(3) Motions for Extensions of Time.** A motion for extension of time for
20 filing a brief may be made no later than the due date for the brief and must comply
21 with the provisions of this Rule and Rule 27.

22 **(A) Contents of Motion.** A motion for extension of time for filing a
23 brief shall include the following:

- 24 (i) The date when the brief is due;
25 (ii) The number of extensions of time previously granted (including a 5-
26 day telephonic extension), and if extensions were granted, the original date when
27 the brief was due;
28 (iii) Whether any previous requests for extensions of time have been
denied or denied in part;
(iv) The reasons or grounds why an extension is necessary; and

1 (v) The length of the extension requested and the date on which the brief
2 would become due.

3
4 Appellant admits that the date, as Ordered by the Supreme Court, came and
5 went when Appellant's Counsel was infected with the Coronavirus. As the
6 diagnosis was sudden and unexpected, Mr. Phillips having to quarantine all of the
7 responsibilities fell to his two person staff while he recovered. It was not
8 Appellant's intent to ignore or take the Supreme Court's Order lightly.
9
10

11 There has been no harm to the Respondents as there was no substantial
12 delay, in fact, the Court generally allows for an oral two week extension and the
13 Docketing Statement is now complete and ready to be filed.
14

15 This is Appellant's first request for such an extension.
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DATED this 15th day of December, 2020.

/s/ Brandon L. Phillips, Esq.
BRANDON L. PHILLIPS, ESQ.
Nevada Bar No. 12264
1455 E. Tropicana Ave., Ste. 750
Las Vegas, Nevada 89119
T: (702) 795-0097 F: 795-0097

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Robert Lauer
870 Sierra Vista Dr. #4
Las Vegas, Nevada 89169

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EXHIBIT A

EXHIBIT A



EIGHTH JUDICIAL DISTRICT COURT

REGIONAL JUSTICE CENTER
200 LEWIS AVENUE
LAS VEGAS, NEVADA 89155
(702) 671-0886

RONALD J. ISRAEL
DISTRICT COURT JUDGE

DEPARTMENT XXVIII
JUDY CHAPPELL
Court Recorder

FOR OFFICE USE ONLY	
RECEIVED	12/8/2020 12:21 PM Steven D. Grierson CLERK OF THE COURT
FILED:	<i>Steven D. Grierson</i>
PAGES:	
BILLED:	
COMMENTS:	

TRANSCRIPT ORDER FORM

CASE #: A-18-784807-C

NAME OF CASE: Lawra Kasse Bulen

DATE OF HEARING: May 12, 2020

Would you like a transcript e-mailed to you? ☒ Yes ☐ No
If yes, e-mail address: blp@abetterlegalpractice.com

*DEADLINE FOR TRANSCRIPT: ASAP Thank you.

NAME OF ATTORNEY: Brandon L. Phillips, Esq.

TELEPHONE NUMBER: (702)795-0097

*Please be advised that 30 days is allowed to complete all transcripts.
If you wish to have it completed by a certain date, we will try to
accommodate your request. Thank you.

**** PLEASE FAX ORDER FORM TO 702-366-1407****

EXHIBIT B

EXHIBIT B

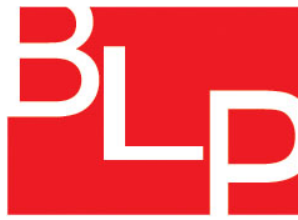
Robin Tucker

From: Robin Tucker
Sent: Tuesday, December 8, 2020 12:47 PM
To: Kirkpatrick, Jessica
Cc: Brandon Phillips
Subject: RE: Bulen v. Lauer, A-18-784807-C

Hello Ms. Kirkpatrick,

We will wait the normal time and pay the regular fee. Thank you for your response, I apologize for any inconvenience. Thank you.

Truly,



Robin Tucker

Legal Assistant

BRANDON L. PHILLIPS, ATTORNEY AT LAW, PLLC

1455 East Tropicana Avenue, Suite 750

Las Vegas, Nevada 89119

Phone: 702-795-0097

Fax: 702-795-0098

Email: rtucker@abetterlegalpractice.com

Website: www.abetterlegalpractice.com

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From: Brandon Phillips <blp@abetterlegalpractice.com>
Sent: Tuesday, December 8, 2020 12:44 PM
To: Robin Tucker <rtucker@abetterlegalpractice.com>
Subject: FW: Bulen v. Lauer, A-18-784807-C

From: Kirkpatrick, Jessica <RamirezJ@clarkcountycourts.us>
Sent: Tuesday, December 8, 2020 12:32 PM
To: Brandon Phillips <blp@abetterlegalpractice.com>
Subject: RE: Bulen v. Lauer, A-18-784807-C

Good morning,

I received this request this afternoon. I noted your request states ASAP. I have 5 requests ahead of yours. I have attached an order form for Dept 8. with normal page rates and expedited rates. It looks like this hearing was about 12 minutes long so it should be 10 or 11 pages. Please let me know which page rate you're agreeing to to get this

expedited ahead of my current requests. If you don't wish to pay the expedited fee then normal time is 30 days, however I will do my best to it as soon as I can.

Jessica Kirkpatrick
Recorder to Honorable Judge Trevor Atkin
702-671-4334

From: Jeter, Sandra
Sent: Tuesday, December 8, 2020 12:16 PM
To: 'BLP@ABETTERLEGALPRACTICE.COM'
Cc: Kirkpatrick, Jessica; Chappell, Judy; Lerner, Lynne
Subject: Bulen v. Lauer, A-18-784807-C
Importance: High

Counsel –

Our office just received the attached Transcript Order Request form; however, it is for a Department 8/Judge Trevor Atkin case. Please contact their Court Recorder, Jessica Kirkpatrick, at (702)671-4334 and/or KirkpatrickJ@ClarkCountyCourt.us, and she will inform you as to their procedure for obtaining the above-requested transcript.

Thank you.

Sandy

Sandra J. Jeter
*Judicial Executive Assistant to the
Honorable Ronald J. Israel*
Eighth Judicial District Court, Department 28
Jeters@ClarkCountyCourts.us
200 Lewis Avenue
Las Vegas, Nevada 89155
(702)671-3631 Chambers
(702)366-1407 Facsimile