

IN THE SUPREME COURT OF THE STATE OF NEVADA

Supreme Court Case No. 81964

Electronically Filed
Dec 13 2021 08:00 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

CHRISTOPHER BEAVOR, an
individual,

Appellant,

vs.

JOSHUA L. TOMSHECK, an
individual,

Respondent.

**MOTION FOR EXTENSION OF TIME
TO FILE REPLY BRIEF
(SECOND REQUEST)**

Appellants hereby move for a thirty (30)-day extension of time to file their reply brief, which is currently due December 13, 2021. If granted, the brief will be due on January 12, 2022. NRAP 31(b)(3). This is the second request for an extension of the reply brief due date. No request for an extension of time has been denied or denied in part.

Appellant's attorneys have been diligently working on the opening brief, but a further thirty (30) day extension of the briefing schedule is

necessary for several reasons.

The undersigned counsel has recently undergone major emergency surgery which has already kept him out of the office for three months and will likely continue for at least another month. Counsel is undergoing cardiac rehab, follow-up appointments, and different treatment modalities. As a result, counsel has not been able to return to full-time work. These events have not allowed the undersigned to work on this Reply Brief as expected.

Under these circumstances, appellant's attorneys will be unable to finish the brief by December 13, 2021. The circumstances set forth in this motion were unforeseeable and good cause exists for a 30-day extension. NRCP 26 (1)(A). Appellant's attorneys firmly believe they will be able to file the reply brief within the extended time.

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Therefore, appellant requests an extension until January 12, 2021.
This motion is made in good faith and without the intent to delay the
appeal unnecessarily.

Dated this 13th day of December 2021.

COHEN JOHNSON LLC

By: /s/ H. Stan Johnson

H. STAN JOHNSON, ESQ.

Nevada Bar No. 0265

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Attorneys for Appellant

CERTIFICATE OF SERVICE

I certify that on 13th day of December 2021, pursuant to N.E.F.R. 7, I caused the MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF (Second Request) to be filed electronically with the Clerk of the Nevada Supreme Court. Pursuant to N.E.F.R. 9, notice of an electronically filed document by the Court “shall be considered as valid and effective service of the document” on all persons who are registered users.

DATED the 13th day of December 2021.

/s/ Sarah Gondek

An employee of COHEN JOHNSON, LLC