

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

2                   ROBERT DARBY VANNAH, ESQ.; JOHN  
3                   BUCHANAN GREENE, ESQ.; and  
4                   ROBERT D. VANNAH, CHTD. d/b/a  
5                   VANNAH & VANNAH; EDGEWORTH  
6                   FAMILY TRUST; AMERICAN GRATING,  
7                   LLC; BRIAN EDGEWORTH AND  
8                   ANGELA EDGEWORTH,  
9                   INDIVIDUALLY, AS HUSBAND AND  
10                  WIFE ,

11                  Appellants,  
12                  vs.

13                  THE LAW OFFICE OF DANIEL S. SIMON,  
14                  A PROFESSIONAL CORPORATION; AND  
15                  DANIEL S. SIMON,

16                                   Respondents.

**SUPREME COURT**

CASE No. 82058 Filed  
Jun 22 2021 02:15 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

17                   **MOTION FOR EXTENSION OF TIME FOR FILING OF**  
18                   **RESPONDENTS' ANSWERING BRIEFS**

19                  The Law Office of Daniel S. Simon and Daniel S. Simon (hereinafter  
20                  “Simon”) hereby moves for a 60-day extension of time for filing their Answering  
21                  Brief to Vannah Appellants’ Opening Brief and their Answering Brief to Edgeworth  
22                  Appellants’ Opening Brief.  
23

24                  Pursuant to NRAP 26(b), Simon requests an extension of time from July 9,  
25                  2021 up to and including September 9, 2021 (60 days) in which to file both their  
26                  Answering Brief to Vannah Appellants’ Opening Brief and their Answering Brief  
27                  to Edgeworth Appellants’ Opening Brief.  
28




1 to Edgeworth Appellants' Opening Brief. Simon has been diligently working on the  
2 preparation of these briefs, but due to previously planned and scheduled travel of  
3 counsel, Simon requires additional time in order to fully complete both of the  
4 Answering Briefs. Specifically, Counsel for Simon will be out of the country on an  
5 extended pre-planned vacation scheduled to return August 15, 2021. This request is  
6 not an attempt to delay or prolong the appellate proceedings and will not cause  
7 undue delay.  
8

9  
10 Therefore, the Answering Brief to Vannah Appellants' Opening Brief and  
11 the Answering Brief to Edgeworth Appellants' Opening Brief would then be due  
12 on or before September 9, 2021. As such, Respondents respectfully request that  
13 their Motion be granted.  
14

15  
16 Dated this 22<sup>nd</sup> day of June, 2021.  
17

18 CHRISTIANSEN TRIAL LAWYERS

19 By   
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## CERTIFICATE OF COMPLIANCE


I hereby certify that this MOTION FOR EXTENSION OF TIME FOR FILING OF RESPONDENTS' ANSWERING BRIEFS complies with the formatting requirements of NRAP 32(a)(4), the typeface requirements of NRAP 32(a)(5) and the type style requirements of NRAP 32(a)(6) because this brief has been prepared in a proportionally spaced typeface using Microsoft Word 2019 in 14 point Times New Roman font. I further certify that this brief complies with the page or type volume limitation of NRAP 32(a)(7) because, excluding the parties of the brief exempted by NRAP 32(a)(7)(C) it does not exceed 30 pages.

I hereby certify that I have read this MOTION FOR EXTENSION OF TIME FOR FILING OF RESPONDENTS' ANSWERING BRIEFS, and to the best of my knowledge, information, and belief, it is not frivolous or interposed for any improper purpose. I further certify that this MOTION FOR EXTENSION OF TIME FOR FILING OF RESPONDENTS' ANSWERING BRIEFS complies with all applicable Nevada Rules of Appellate Procedure, in particular NRAP 28(e)(1), which requires every assertion in the brief regarding matters in the record be supported by a reference to the page of the transcript or appendix where the matter relied on is to be found.

1 I understand that I may be subject to sanctions in the event that it is not in  
2 conformity with the Nevada Rules of Appellate Procedures.

3  
4 Dated this 22<sup>nd</sup> day of June, 2021.

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CHRISTIANSEN  
— TRIAL LAWYERS —



**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 22<sup>nd</sup> day of June 2021, I served a copy of the foregoing MOTION FOR EXTENSION OF TIME FOR FILING OF RESPONDENTS' ANSWERING BRIEFS on the following parties by electronic service pursuant to Nevada Rules of Appellate Procedure:

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