

IN THE SUPREME COURT OF THE STATE OF NEVADA

EDGEWORTH FAMILY TRUST;
AMERICAN GRATING, LLC; BRIAN
EDGEWORTH AND ANGELA
EDGEWORTH, INDIVIDUALLY,
AND AS HUSBAND AND WIFE;
ROBERT DARBY VANNAH, ESQ.;
JOHN BUCHANAN GREENE, ESQ.;
AND ROBERT D. VANNAH, CHTD,
d/b/a VANNAH & VANNAH, and
DOES I through V and ROE
CORPORATIONS VI through X,
inclusive,

Appellants,

v.

LAW OFFICE OF DANIEL S. SIMON,
A PROFESSIONAL CORPORATION;
DANIEL S. SIMON,

Respondents.

Electronically Filed
Sep 18 2021 02:04 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Supreme Court Case No. 82058

District Court Case No. A-19-807433-C

**EDGEWORTH APPELLANTS'
MOTION TO EXTEND DEADLINE
FOR REPLY BRIEF

(FIRST REQUEST)**

Pursuant to NRAP 26(b)(1)(A) and 31(b)(3), Appellants Edgeworth Family Trust, American Grating, LLC, Brian Edgeworth, Angela Edgeworth (collectively the "Edgeworths") hereby move for an order extending the deadline to file their Reply brief from September 23, 2021 to October 26, 2021 (33 days).

Despite diligence in the preparation of the reply brief, the Edgeworth's counsel requires additional time to complete the reply brief due to previously planned and scheduled travel. The Edgeworth's counsel

will be out of state to attend to previously planned personal and family matters, and will return to Las Vegas the evening of October 24, 2021. With the requested extension, the reply brief would be due on October 26, 2021.

The requested 33 day extension would not result in prejudice to any party, undue delay of these proceedings, and is not sought for purposes of delay.

For the foregoing reasons, counsel for the Edgeworths respectfully asks that the Court extend the deadline to file its Reply Brief to and including October 26, 2021.

MORRIS LAW GROUP

By: /s/ROSA SOLIS-RAINEY

Steve Morris, Bar No. 1543

Rosa Solis-Rainey, No. 7921

801 S. Rancho Drive, Ste B4

Las Vegas, Nevada 89106

Telephone: 702-474-9400

Facsimile: 702-474-9422

sm@morrislawgroup.com

rsr@morrislawgroup.com

*Attorneys for Appellants Edgeworth
Family Trust; American Grating, LLC;
Brian Edgeworth and Angela
Edgeworth*

CERTIFICATE OF SERVICE

Pursuant to Nev. R. App. P. 25 and NEFR 9(f), I certify that I am an employee of Morris Law Group; that on this date I electronically filed the foregoing **EDGEWORTH APPELLANTS' MOTION TO EXTEND DEADLINE FOR REPLY BRIEF** with the Clerk of the Court for the Nevada Supreme Court by using the Nevada Supreme Court's E-Filing system (Eflex). Participants in the case who are registered with Eflex as users will be served by the Eflex system as follows:

TO:

Patricia A. Marr
PATRICIA A. MARR LTD.
2470 St. Rose Pkwy. #110
Henderson, NV 89074

Attorneys for Appellants Robert Darby Vannah; Esq.; John Buchanan Greene, Esq.; Robert D. Vannah, Chtd, D/B/A Vannah & Vannah

Peter S. Christiansen, Bar No. 5254
Kendele L. Works, Bar No. 9611
CHRISTIANSEN LAW OFFICES
810 S. Casino Center Blvd., Ste 104
Las Vegas, NV 89101

Attorneys for Respondent Law Office of Daniel S. Simon, A Professional Corporation; and Daniel S. Simon

Dated this 18th day of September, 2021.

/s/ Gabriela Mercado