

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

NONA TOBIN, AN INDIVIDUAL,

Appellant,

v.

JOEL A. STOKES, AN INDIVIDUAL,  
JOEL A. STOKES AND SANDRA F.  
STOKES, AS TRUSTEES OF  
JIMIACK IRREVOCABLE TRUST,  
AND JIMIACK IRREVOCABLE  
TRUST,

Respondents,

Electronically Filed  
Mar 31 2021 02:06 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**Supreme Court No. 82094**  
District Court Case No. A-19-  
799890-C

**MOTION TO EXTEND TIME TO FILE**  
**OPENING BRIEF AND APPENDIX**

COMES NOW, Appellant NONA TOBIN, by and through her attorney, JOHN W. THOMSON, ESQ. of THOMSON LAW PC, and hereby submits this Motion to Extend Time to File Opening Brief and Appendix. This Motion is based on the pleadings and papers on file with the Court, and the Points and Authorities attached.

DATED this 31<sup>st</sup> day of March 2021.

**THOMSON LAW PC**

*/s/ John W. Thomson*  
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JOHN W. THOMSON, ESQ.  
Nevada Bar No. 5802  
2450 St. Rose Pkwy, Ste 120  
Henderson, NV 89074  
*Attorney for Appellant Nona Tobin*

## MEMORANDUM OF POINTS AND AUTHORITIES

### **I. SUMMARY OF MOTION**

The present matter is an appeal from the eighth judicial district court. Nona Tobin filed her Notice of Appeal as an individual on November 9, 2020. The Nevada Supreme Court issued an Order Removing from Settlement Program and Reinstating Briefing on February 22, 2021. Ms. Tobin's Opening Brief and Appendix is due on April 8, 2021. Appellant needs more time to prepare her Opening Brief and Appendix.

### **II. LEGAL ARGUMENT**

NRAP 26(b)(1)(A) states:“(b) **Extending Time. (1) By Court Order** (A) For good cause, the court may extend the time prescribed by these Rules or by its order to perform any act, or may permit an act to be done after that time expires.”

This Court has discretion to extend the time for Ms. Tobin to file her Opening Brief and Appendix. Ms. Dickerson has good cause for an extension of time and the reason being is provided below: 1) Due to a heavy caseload and backlog of the courts due to the pandemic, appellant's attorney, a sole practitioner, needs additional time to complete the brief; and 2) Attorney's time is also limited due to a family vacation booked before the briefing

schedule was revealed . We respectfully request a thirty-day extension of time until May 10, 2021.

**III. Conclusion**

WHEREFORE, Appellant Nona Tobin by and through her attorney of record, John W. Thomson, respectfully asks this Court to enter an order granting her an extension of time to file her Opening Brief and Appendix at the earliest date by May 10, 2021.

Dated this 31<sup>st</sup> day of March, 2021.

THOMSON LAW PC

By: /s/ John W. Thomson  
JOHN W. THOMSON, ESQ.  
Nevada Bar No. 5802  
2450 St. Rose Parkway, Suite 120  
Henderson, Nevada 89074  
*Attorney for Appellant Nona  
Tobin as an individual*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies on March 31, 2021, a true and correct copy of **APPELLANT NONA TOBIN'S MOTION TO EXTEND TIME TO FILE OPENING BRIEF AND APPENDIX** was served via the Court's Eflex service system.

/s/ Annette Cooper  
An employee of the Thomson Law PC