

IN THE SUPREME COURT OF THE STATE OF NEVADA

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JUSTIN BLOUNT; AND
STEPHANIE BLOUNT,

Appellants,

vs.

PAULA BLOUNT,

Respondent.

S.C. No.:
D.C. Case No.:

82095
Electronically Filed
560593
Sep 03 2021 03:00 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

MOTION FOR ENLARGEMENT OF TIME

Respondent, Paula Blount, by and through her attorneys, Marshal S. Willick, Esq. and Trevor M. Creel, Esq., of the WILLICK LAW GROUP, moves this Court for an enlargement of time within which to file the Respondent's Answering Brief. This Motion is based on the following memorandum and

declaration of counsel and all papers and pleadings on file herein.

Dated this 3rd day of September, 2021.

Respectfully Submitted By:
WILLICK LAW GROUP

//s// Trevor M. Creel

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MEMORANDUM

I, Trevor M. Creel, Esq., am a duly licensed attorney in the State of Nevada and am employed by the WILICK LAW GROUP. Respondent requests a 14-day extension of time in which to file her Answering Brief under NRAP 26(b)(1)(A) and NRAP 31(b)(3). Respondent's brief is currently due September 3, 2021. This is the Respondent's first request for an extension of time in this case.

This is an Appeal from the Clark County family court which determined that the orders from the Tribal Courts of Hualapai Tribe, Peach Springs, State of Arizona shall be given full faith and credit; Hon. Rena G. Hughes, District Court Judge, Department J, presiding.

We received a copy of this Court's *Order to File Document* on August 20, 2021, discovered the underlying calendaring error, and immediately began working on our Answering Brief.

Under NRAP 30, Appellants were required to attempt to reach agreement concerning a possible joint appendix. Appellants did not make any attempt at agreement or produce a proposed Appendix before filing the *Opening Brief*.

Upon review of the brief and record supplied by Appellants, it became clear that both were deficient and an entirely separate Appendix would be required to allow for meaningful citations to the record. We found a number of documents missing from Appellants' appendix, which is improperly set up as a series of lettered "exhibits" and was not provided in proper order, making reference to the actual record difficult and in some cases impossible.

This rendered the drafting of our Answering Brief more time consuming and required us to also take the time to create a separate Appendix that contains the entire record as described in NRAP 10, which we will file with our brief. The *Answering Brief* and *Respondent's Appendix* are mostly complete as of this writing, but not yet ready to file.

Due to these circumstances, Respondent respectfully requests an additional 14-days within which to file her Answering Brief. We expect it will be filed in less time than that.

This Motion is made in good faith and not for purposes of undue delay.

I declare under penalty of perjury that the factual representations set forth
in the foregoing memorandum are true and correct.

Dated this 3rd day of September, 2021.

//s// Trevor M. Creel

Trevor M. Creel, Esq.
Attorney for Respondent

CERTIFICATE OF SERVICE

Pursuant to NRAP 25 (5)(d)(1) I certify that I am an employee of the
WILICK LAW GROUP and that on this 3rd day of September, 2021, a
document entitled *Motion for Enlargement of Time* was filed electronically
with the Clerk of the Nevada Supreme Court, and therefore electronic service
was made in accordance with the master service list as follows, to the listed
Appellants below at the address, email address, and/or facsimile number
indicated below:

Trevor Waite, Esq.
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/s/ Victoria Javiel
An Employee of WILICK LAW GROUP

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