

THE COURT OF APPEALS OF THE STATE OF NEVADA

NONA TOBIN,

Appellant,

v.

BRIAN CHIESI, an individual; DEBORA CHIESI, an individual; QUICKEN LOANS, INC.; JOEL A. STOKES, an individual; JOEL A. STOCKS and SANDRA F. STOKES as Trustees of the JIMI JACK IRREVOCABLE TRUST; REDROCK FINANCIAL SERVICES; and NATIONSTAR MORTGAGE, LLC,

Respondents.

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Elizabeth A. Brown
Clerk of Supreme Court

Case No.: 82294

Dist. Court No.: A-19-799890-C

**APPELLANT NONA TOBIN'S MOTION FOR EXTENSION
OF TIME TO FILE REPLY BRIEF**

MEMORANDUM OF POINTS AND AUTHORITIES

I. Introduction

Out of an abundance of caution, Appellant Nona Tobin ("Ms. Tobin") respectfully requests that this Court grant an extension of time to file her Reply Brief, and consolidate the filing deadlines for Ms. Tobin's reply brief. This would allow her at least thirty (30) days following the filing of the last of the various Respondents' Answering Brief in which to file one Reply Brief. As there are

multiple respondents, and at least one has already requested an extension to file its answering brief, Ms. Tobin requests this Court to extend her reply brief filing deadline and consolidate it to ensure that she does not suffer any prejudice in this appeal.

II. Facts and Legal Argument

On September 29, 2021, Appellant Nona Tobin filed her opening brief, and served all Respondents' Brian Chiesi, Debora Chiesi, Quicken Loans Inc. (collectively, the "Chiesi Respondents"), Joel A. Stokes, individually, Joel A. Stokes and Sandra F. Stokes, as Trustees of the Jimijack Irrevocable Trust, Jimijack Irrevocable Trust, Red Rock Financial Services, and Nationstar Mortgage, LLC.

Pursuant to NRAP 31(A)(1)(c), a reply brief is due thirty (30) days following the filing of an answering brief. On October 25, 2021, the Chiesi Respondents filed their Answering Brief. However, on October 28, 2021, this Court granted Respondent Red Rock Financial Services an extension of time to file its answering brief until November 15, 2021. Thus, if Ms. Tobin filed her reply brief on November 23, 2021 in response to the Chiesi's, she would be unduly prejudiced by having to file yet another reply brief on December 15, 2021. Therefore, to prevent Ms. Tobin from being unduly prejudiced by filing multiple reply briefs, and for the economy of the court and parties, Ms. Tobin respectfully requests this Court grant her motion to extend the time and allow her to file one Reply Brief after all of the Respondents

have filed their respective Response Briefs. Granting this Motion would consolidate the deadline for filing her reply brief until at least 30 days after the filing of the last of Respondents' Answering Briefs.

II. Conclusion

In conclusion, to ensure that Ms. Tobin is not unduly prejudiced by being required to file multiple reply briefs, Ms. Tobin respectfully requests an extension of time and consolidation of the deadline to file her reply brief until at least 30 days after the last respondent has filed its answering brief.

Dated this 9th day of November, 2021.

Respectfully submitted by:

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/s/John W. Thomson, Esq. _____

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CERTIFICATE OF SERVICE

The undersigned hereby certifies on November 9, 2021, a true and correct copy of **APPELLANT NONA TOBIN'S MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF** was served via the Court's Eflex service system to the following:

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