

Christian M. Morris, Esq.  
Nevada Bar No. 11218  
NETTLES | MORRIS  
1389 Galleria Drive, Suite 200  
Henderson, Nevada 89014  
Telephone: (702) 434-8282  
Facsimile: (702) 434-1488  
[christian@nettlesmorris.com](mailto:christian@nettlesmorris.com)  
*Attorneys for Respondent Ingrid Patin*

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Elizabeth A. Brown  
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**IN THE SUPREME COURT OF THE STATE OF NEVADA**

TON VINH LEE,

Appellant,

vs.

INGRID PATIN, an individual, and PATIN  
LAW GROUP, PLLC, a Nevada Professional  
LLC,

Respondents.

**Supreme Court No.: 82516**

District Court Case No.:

A-15-723134-C

**MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S  
ANSWERING BRIEF AND APPENDIX (FIRST REQUEST)**

Respondent, Ingrid Patin ("Respondent"), by and through her counsel of record, Christian M. Morris, Esq., of the law firm Nettles Morris, hereby moves this Honorable Court pursuant to NRAP 31(b) for an extension of 30-days to file Respondent's answering brief and appendix.

Respondent's answering brief and appendix are currently due August 26, 2021. If this Court grants this request for a 30-day extension of time, the answering

brief and appendix will be due on September 27, 2021. This is Respondent's first request for an extension of time to file her answering brief and appendix.

Good cause exists for allowing Respondent to extend the filing deadline for the following reasons:

1. Micah Echols, Esq. of Claggett & Sykes Law Firm has been in trial with the verdict being reached on August 24, 2021.
2. Christian M. Morris, Esq. of Nettles | Morris Law Firm has recently completed a 3-week trial and has had voluminous post-trial motions to prepare.
3. Christian M. Morris, Esq., of Nettles | Morris Law Firm has also been managing a second case load due to attorney turn over in her office.

This motion is submitted in good faith and for good cause shown in accordance with NRAP 26. For the foregoing reasons, Respondent respectfully request a 30-day extension of time, until September 27, 2021, within which to file Respondent's answering brief and appendix.

Dated this 24<sup>th</sup> day of August, 2021.

NETTLES | MORRIS

*/s/ Christian M. Morris*

Christian M. Morris, Esq.

Nevada Bar No. 11218

1389 Galleria Drive, Suite 200

Henderson, Nevada 89014

*Attorneys for Respondent, Ingrid Patin*

## CERTIFICATE OF SERVICE

I certify that on the 24<sup>th</sup> day of August, 2021, I served a copy of this completed docketing statement upon all counsel of record:

☒ Via the Supreme Court electronic service to:

Prescott Jones, Esq.  
Myraleigh Alberto, Esq.  
RESNICK & LOUIS, P.C.  
8925 W. Russell Road, Suite 220  
Las Vegas, NV 89148  
*Attorneys for Ton Vinh Lee*

☐ By mailing it by first class mail with sufficient postage prepaid to the following address(es):

Dated this 24<sup>th</sup> day of August, 2021.

/s/ Jenn Alexy

Signature