## IN THE SUPREME COURT OF THE STATE OF NEVADA

TON VINH LEE, AN INDIVIDUAL,

Appellant,

vs.

INGRID PATIN, AN INDIVIDUAL; AND PATIN LAW GROUP, PLLC, A NEVADA PROFESSIONAL LLC,

Respondents.

No. 82516

Electronically Filed Sep 24 2021 02:49 p.m. Elizabeth A. Brown Clerk of Supreme Court

# MOTION FOR EXTENSION OF TIME TO FILE RESPONDENTS' ANSWERING BRIEF AND APPENDIX

Respondents, Ingrid Patin and Patin Law Group, PLLC, by and through their counsel of record, hereby move this Honorable Court pursuant to NRAP 31(b) for an extension of 30 days to file their answering brief and any appendix.

Respondent's answering brief and appendix were originally due on August 26, 2021. This Court previously granted one extension of time to September 27, 2021. No request for additional time has been denied or denied in part. If this Court grants this request for an extension of time, the answering brief and appendix will be due on October 27, 2021.

Good cause exists to grant the requested extension of 30 days for the following reason: Respondents' counsel, Micah S. Echols and David P. Snyder, were recently retained and need time to familiarize themselves with the record, the legal arguments, and the briefing currently before the Court. The additional time will also allow counsel to confer with trial counsel on the draft of the answering brief and their clients.

This motion is submitted in good faith and for good cause shown in accordance with NRAP 31(b). For the foregoing reason, Respondents respectfully request a 30-day extension of time, until October 27, 2021, within which to file and serve their answering brief and any appendix.

Dated this <u>24th</u> day of September 2021.

#### **CLAGGETT & SYKES LAW FIRM**

By <u>/s/ Micah S. Echols</u> Micah S. Echols, Esq. Nevada Bar No. 8437 David P. Snyder, Esq. Nevada Bar No. 15333 4101 Meadows Lane, Suite 100 Las Vegas, Nevada 89107 Attorneys for Respondents, Ingrid Patin and Patin Law Group, PLLC

# Certificate of Service

I hereby certify that I electronically filed the foregoing Motion for

Extension of Time to File Respondents' Answering Brief and Appendix

with the Supreme Court of Nevada on the <u>24th</u> day of September 2021.

I will electronically serve the foregoing document in accordance with the

Master Service List as follows:

## Appellant, Ton Vinh Lee

Myraleigh A. Alberto (Resnick & Louis, P.C./Las Vegas) Prescott T. Jones (Resnick & Louis, P.C./Las Vegas)

# **Respondent, Ingrid Patin**

Victoria R. Allen (Nettles Morris) Christian M. Morris (Nettles Morris) Brian D. Nettles (Nettles Morris)

# Respondent

Patin Law Group, PLLC Kerry J. Doyle (Doyle Law Group)

> <u>/s/ Anna Gresl</u> Anna Gresl, an employee of CLAGGETT & SYKES LAW FIRM