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Electronically Filed
Nov 30 2021 09:02 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

SUPREME COURT OF NEVADA

IN THE MATTER OF: E.S., A CHILD
STATE OF NEVADA,

Case No.: 82614

Appellant,

vs.

E.S., A CHILD,
Respondent

SECOND MOTION TO PERMIT LATE FILING

COMES NOW, EDWARD STEEVES, by and through his attorney of record and respectfully brings this Motion to Permit Late Filing of Respondent's Answering Brief.

MEMORANDUM OF POINTS AND AUTHORITIES

I. ARGUMENT

On September 27, 2021, this Honorable Court issued an Order Granting Leave To Appeal And Directing Full Briefing. On September 29, 2021, former counsel of record and appointed public defender, Daniel Martinez filed a Substitution of Attorney pursuant to NRAP 46(d)(2).

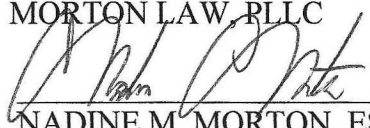
Appellant filed its Brief on October 5, 2021. Pursuant to this Court's Order Respondent had 28 days from the date that appellant's brief is served to file and serve the Answering Brief. Accordingly, Respondent's Brief was due November 22, 2021. The Answering Brief was completed; however, due to filing errors, Respondent was not able to e-file the correct documents until November 26, 2021. Again, the Answering Brief and Appendix were completed

1 a week prior, but filing complications existed, which resulted in the documents not being filed by
2 November 22, 2021, but rather on November 26, 2021. .

3
4 Counsel sincerely apologizes to the Court and the State for the inconvenience. Given this
5 case deals with an issue of public concern and first impression, it would respectfully be in the
6 public interest for this matter to be decided on the merits.

7 For the foregoing reasons, Mr. Steeves, by and through his attorney of record, respectfully
8 requests that this Honorable Court not hold his Counsel's honest inadvertence, which they
9 respectfully apologize for, against him and permit the filing of the Respondent's Answering
10 Brief which is attached to this filing as Exhibit A.

11 DATED this 30th day of November, 2021.


12
13 By: 
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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I hereby certify that I am an employee of MORTON LAW, PLLC, and that I caused to be served a true and correct copy of the foregoing by:

- ☒ Mail on all parties in said action, by placing a true copy thereof enclosed in a sealed envelope in a designated area for outgoing mail, addressed as set forth below. At Nadine Morton Law Office mail placed in that designated area is given the correct amount of postage and is deposited that same date in the ordinary course of business, in a United States mailbox in the City of Las Vegas, County of Clark, Nevada.
- ☒ By Electronic service by filing the foregoing with the Clerk of Court using the Odyssey online filing system, which will electronically mail the filing to the following individuals at the email addresses registered for this case.
- ☐ Personal delivery by causing a true copy thereof to be hand delivered this date to the address(es) at the address(es) set forth below.
- ☐ Facsimile on the parties in said action by causing a true copy thereof to be telecopied to the number indicated after the address(es) set forth below.
- ☐ Federal Express or other overnight delivery.

DATED this 30th day of November, 2021.



An employee of MORTON LAW, PLLC