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Attorneys for Appellant, Vivian Harrison

IN THE SUPREME COURT OF THE STATE OF NEVADA

VIVIAN HARRISON,

Appellant,

v.

RAMPARTS INC. dba LUXOR HOTEL
& CASINO,

Respondent.

Case No.: 80167

MOTION FOR EXTENSION OF TIME TO FILE
APPELLANT'S OPENING BRIEF
(Fourth Request)

Appellant, Vivia Harrison (“Appellant”), by and through her counsel of record, Moss Berg Injury Lawyers and Claggett & Sykes Law Firm, hereby moves this Honorable Court for an extension of one week to file her opening brief.

Appellant’s opening brief was originally due on June 9, 2020. This Court previously granted a third extension of time to August 24, 2020. No request for additional time has been denied or denied in part. If this Court grants this request for an extension of one week, Appellant’s opening brief will be due on August 31, 2020. Pursuant to Rule 26, “[f]or good cause, the court may extend the time prescribed by these Rules or by its order to perform any act” (NRAP 26(1)(A)).

Good cause exists to grant the requested extension for the following reasons:

1. Appellant’s counsel, Mr. Echols had a back procedure on August 13, 2020, that rendered him immobile and nearly bedbound for approximately a week. After receiving the procedure, Mr. Echols has visited the offices of several medical professionals in an effort to explore possible options to address the injury and the pain.

2. Despite the setback, Appellant’s counsel has worked diligently to meet the current deadline to file and serve Appellant’s opening brief. However, this unexpected event has caused an unforeseen delay in finalizing the opening brief.

3. The request seeks only a short extension of 7 days.

This motion is submitted in good faith and for good cause shown in

accordance with NRAP 26. For the foregoing reasons, Appellant respectfully request an one week extension of time, until August 31, 2020, within which to file her opening brief.

DATED this 24th day of August, 2020.

CLAGGETT & SYKES LAW FIRM

By /s/ Micah S. Echols
Micah S. Echols, Esq.
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Las Vegas, Nevada 89107
Attorneys for Appellant,
Vivia Harrison

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S OPENING BRIEF (Fourth Request)** was filed electronically with the Supreme Court of Nevada on the 24th day of August, 2020. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Boyd B. Moss, Esq.
Matthew G. Pfau, Esq.
Loren S. Young, Esq.
Mark B. Bailus, Esq.

I further certify that I served a copy of this document by first class mail with sufficient postage, prepaid to the following address(es): N/A

/s/ Anna Gresl
Anna Gresl, an employee of
Claggett & Sykes Law Firm