| 1  | RESNICK & LOUIS, P.C.   |  |
|----|---|--|
| 2  | PRESCOTT JONES<br>Nevada Bar No. 11617  |  |
| 3  | pjones@rlattorneys.com<br>MYRALEIGH A. ALBERTO  | Electronically Filed<br>Nov 12 2021 11:47 a.m.             |
| 4  | Nevada Bar No. 14340  | Elizabeth A. Brown   |
| 5  | <u>malberto@rlattorneys.com</u><br>8925 W. Russell Road, Suite 220                                | Clerk of Supreme Court                                     |
| 6  | Las Vegas, Nevada 89148<br>Telephone: (702) 997-3800  |  |
| 7  | Facsimile: (702) 997-3800<br>Attorneys for Plaintiff,   |  |
| 8  | Ton Vinh Lee  |  |
| 9  | IN THE SUPREME COURT OF THE STATE OF NEVADA   |  |
| 10 |   |  |
| 11 | TON VINH LEE,   | Supreme Court No. 83213                                    |
| 12 | Plaintiff,  | District Court Case No.: A-15-723134-C                     |
| 13 | V.  | APPELLANT'S MOTION FOR                                     |
| 14 | INGRID PATIN, an individual, and PATIN  | EXTENSION OF TIME TO FILE<br>OPENING BRIEF (FIRST REQUEST) |
| 15 | LAW GROUP, PLLC, a Nevada Professional LLC,   |  |
| 16 | Defendants.   |  |
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| 19 | Appellant Ton Vinh Lee, an individual, by and through his counsel of record, Prescott T.          |  |
| 20 | Jones, Esq. and Myraleigh A. Alberto, Esq. of Resnick & Louis, P.C., hereby submits this          |  |
| 21 | Motion for Extension of Time to File Opening Brief and Appendix (First Request) in the above-     |  |
| 22 | captioned matter pursuant to NRAP 31(b)(3).   |  |
| 23 |   | v due on November 15 2021 No previous                      |
| 24 | Appellant's Opening Brief is currently due on November 15, 2021. No previous                      |  |
| 25 | extensions for Appellant's Opening Brief or Appendix have been requested or granted in this       |  |
| 26 | case. Appellant requests an extension of thirty (30) days to file his Opening Brief and Appendix. |  |
| 27 |   |  |
| 28 |   |  |
|    |   | Docket 83213 Document 2021-32500                           |

| 1        | If the requested extension is granted, Appellant's Opening Brief and Appendix would be due on     |  |  |
|----------|---|--|--|
| 2        | December 15, 2021.  |  |  |
| 3        | Good cause exists for Appellant's requested extension because counsel for Appellant has           |  |  |
| 4        | had unforeseen personal issues arise. As a result, Appellant requires additional time to complete |  |  |
| 5        | the Opening Brief and Appendix.   |  |  |
| 6        | This Motion is submitted in good faith and for good cause shown in accordance with                |  |  |
| 7<br>8   | NRAP 31(b). For the foregoing reason, Appellant respectfully requests a 30-day extension of       |  |  |
| 8<br>9   | time, until December 15, 2021, to file and serve his Opening Brief and Appendix.                  |  |  |
| 10       |   |  |  |
| 11       | DATED this 12th day of November, 2021.  |  |  |
| 12       | RESNICK & LOUIS, P.C.   |  |  |
| 13       | /s/ Prescott T. Jones   |  |  |
| 14       | PRESCOTT JONES, ESQ.<br>Nevada Bar No. 11617  |  |  |
| 15       | MYRALEIGH A. ALBERTO, ESQ.<br>Nevada Bar No. 14340  |  |  |
| 16       | 8925 W. Russell Road, Suite 220<br>Las Vegas, NV 89148  |  |  |
| 17       | Attorneys for Plaintiff,<br>Ton Vinh Lee  |  |  |
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