

IN THE SUPREME COURT OF THE STATE OF NEVADA

TON VINH LEE, AN INDIVIDUAL,  
Appellant/Cross-Respondent,  
vs.  
INGRID PATIN, AN INDIVIDUAL;  
Respondent/Cross-Appellant,  
and  
PATIN LAW GROUP, PLLC, A  
NEVADA PROFESSIONAL, PLLC,  
Respondent.

No. 83213

Electronically Filed  
Jan 18 2022 04:58 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**MOTION FOR EXTENSION OF TIME TO FILE RESPONDENTS/  
CROSS-APPELLANT'S COMBINED ANSWERING BRIEF ON  
APPEAL AND OPENING BRIEF ON CROSS-APPEAL**  
(First Request)

Respondents/Cross-Appellant, 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 combined answering brief on appeal and opening brief on cross-appeal.

Respondents/Cross-Appellant's brief was originally due on January 18, 2022. No request for additional time has been denied or denied in part. If this Court grants this request for an extension of time, the combined brief will be due on February 17, 2022.

Good cause exists to grant the requested extension of 30 days for the following reason:

1. Even though all employees at Claggett & Sykes are vaccinated, several individuals tested positive for COVID-19 on December 21, 2021, causing the entire office to be unexpectedly closed through the end of the year.

2. Upon the reopening of Claggett & Sykes' office, our appellate paralegal's minor child tested positive for COVID-19 on January 14, 2022, and is self-quarantine at home while her child recovers.

3. These unpredictable transitions to remote work to office work have caused tremendous delays for various reasons, including, not being able to have full workstations, the difficulty of having each member of the appellate team in a different location, with the added responsibilities that come from working at home. Accordingly, normal tasks take longer, including the preparation of the briefing and appendix in this case. Despite these setbacks, Mr. Echols and Mr. Snyder have worked diligently to meet the current filing deadline, but due to the number of issues that need to be addressed, additional time to complete the combined brief is needed.

This motion is submitted in good faith and for good cause shown in accordance with NRAP 31(b). For the foregoing reasons, Respondents/Cross-Appellant respectfully request a 30-day extension of time, until February 17, 2022, within which to file and serve their answering brief on appeal and opening brief on cross-appeal.

Dated this 18th day of January 2022.

CLAGGETT & SYKES LAW FIRM

By /s/ Micah S. Echols  
Micah S. Echols, Esq.  
Nevada Bar No. 8437  
David P. Snyder, Esq.  
Nevada Bar No. 15333  
4101 Meadows Lane, Ste. 100  
Las Vegas, Nevada 89107  
(702) 655-2346 – Telephone  
[micah@claggettlaw.com](mailto:micah@claggettlaw.com)  
[david@claggettlaw.com](mailto:david@claggettlaw.com)

*Attorneys for Respondents/Cross-Appellant, 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/ CROSS-APPELLANT'S COMBINED ANSWERING BRIEF ON APPEAL AND OPENING BRIEF ON CROSS-APPEAL (First Request)** with the Supreme Court of Nevada on the 18th day of January 2022. Electronic service of the foregoing document was made in accordance with the Master Service List as follows:

Prescott T. Jones, Esq.  
[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)  
Myraleigh Alberto McGill, Esq.  
[malberto@rlattorneys.com](mailto:malberto@rlattorneys.com)  
RESNICK & LOUIS, P.C.  
8925 West Russell Road, Ste. 220, Las Vegas, Nevada 89148  
(702) 997-3800 – Telephone  
*Attorneys for Appellant / Cross-Respondent, Ton Vinh Lee*

Victoria R. Allen, Esq.  
[victoria@nettlesmorris.com](mailto:victoria@nettlesmorris.com)  
Christian M. Morris, Esq.  
[christian@nettlesmorris.com](mailto:christian@nettlesmorris.com)  
Brian D. Nettles, Esq.  
[brian@nettlesmorris.com](mailto:brian@nettlesmorris.com)  
NETTLES MORRIS LAW FIRM  
1389 Galleria Drive, Ste. 200, Henderson, Nevada 89014  
(702) 434-8282 – Telephone  
*Attorneys for Respondent / Cross-Appellant, Ingrid Patin*

Kerry J. Doyle, Esq.  
[kdoyle@doylelawgrouplv.com](mailto:kdoyle@doylelawgrouplv.com)  
DOYLE LAW GROUP, LLC  
376 East Warm Springs Road, Ste. 140, Las Vegas, Nevada 89119  
(702) 706-3323 – Telephone  
*Attorneys for Respondent, Patin Law Group, PLLC*

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