

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
Feb 16 2022 11:17 a.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**
(Second 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. This Court previously granted a second extension of time to February 17, 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 Monday, March 21, 2022.

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

1. On January 27, 2022, Micah S. Echols, Esq., lead appellate counsel for Respondents/Cross-Appellant Ingrid Patin and Patin Law Group, PLLC, underwent lumbar surgery, resulting from a 2019 car crash. Unfortunately, Mr. Echols's recovery did not go as planned and he returned to the hospital, where he stayed in the ICU for almost a week. Mr. Echols was discharged on February 7, 2022 and is not due to return to the office for another few weeks.

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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 March 21, 2022, within which to file and serve their answering brief on appeal and opening brief on cross-appeal.

Dated this 16th day of February 2022.

CLAGGETT & SYKES LAW FIRM

By /s/ Micah S. Echols
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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 (Second Request)** with the Nevada Supreme Court on the 16th day of February 2022. I will electronically serve the foregoing document in accordance with the Master Service List as follows:

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CLAGGETT & SYKES LAW FIRM