

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

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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
(Third Request)**

Respondent/Cross-Appellant, Ingrid Patin and Respondent, Patin Law Group, PLLC ("Respondents/Cross-Appellant"), 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 March 21, 2022. No request for additional time has been denied or denied in part. If this Court grants this request for an extension of 30 days,

Respondents/Cross-Appellant's combined brief will be due on Wednesday, April 20, 2022.

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

1. On January 18, 2022, Respondents/Cross-Appellant filed their first motion for extension to file their combined brief by 30 days since Claggett & Sykes Law Firm closed its office to all staff from December 21, 2021 to January 3, 2022, as the result of several positive cases of COVID-19 within the office. In addition, Claggett & Sykes appellate paralegal was in self-quarantined at home from January 14, 2022 to January 24, 2022 while her minor child recovered from COVID-19. The Court granted this extension of time, making Respondents/Cross-Appellant's combined brief due February 17, 2022.

2. On January 27, 2022, Micah S. Echols, Esq., lead appellate counsel for Respondents/Cross-Appellant underwent lumbar surgery. Unfortunately, Mr. Echols' recovery did not go as planned and he returned to the hospital, where he stayed in the ICU for almost a week. As a result, Respondents/Cross-Appellant filed a second extension on

February 16, 2022. The Court granted this extension of time, making Respondents/Cross-Appellant's combined due March 21, 2022.

3. In hindsight, Respondents/Cross-Appellant should have requested additional time in their second extension of time given Mr. Echols' condition after his lumbar surgery and required recovery period, especially with the complications. Although he has returned to the office, Mr. Echols is still recovering from his surgery and does not expect to fully recover for another few months.

Given the circumstances, Respondents/Cross-Appellant respectfully request a 30-day extension of time, until April 20, 2022, within which to file their combined answering brief on appeal and opening brief on cross-appeal. This motion is submitted in good faith and for good cause shown in accordance with the NRAP 31(b).

Dated this 21st day of March 2022.

CLAGGETT & SYKES LAW FIRM

By /s/ Micah S. Echols
Micah S. Echols, Esq.
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Nevada Bar No. 15333
*Attorneys for Respondents/
Cross-Appellant*

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 (Third Request)** with the Nevada Supreme Court on the 21st day of March 2022. I will electronically serve the foregoing document in accordance with the Master Service List as follows:

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