

1 **RESNICK & LOUIS, P.C.**
PRESCOTT T. JONES
2 Nevada Bar No. 11617
pjones@rlattorneys.com
3 MYRALEIGH ALBERTO MCGILL
Nevada Bar No. 14340
4 mmcgill@rlattorneys.com
8925 W. Russell Road, Suite 220
5 Las Vegas, Nevada 89148
Telephone: (702) 997-3800
6 Facsimile: (702) 997-3800
Attorneys for Appellant
7 *Ton Vinh Lee*

Electronically Filed
May 19 2022 12:52 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

8 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

9
10 TON VINH LEE,

11 Plaintiff,

12 v.

13 INGRID PATIN, an individual, and PATIN
LAW GROUP, PLLC, a Nevada Professional
14 LLC,

15 Defendants.

Supreme Court No. 83213
District Court Case No.: A-15-723134-C

**APPELLANT'S MOTION FOR
EXTENSION OF TIME TO FILE
COMBINED REPLY BRIEF ON
APPEAL AND ANSWERING BRIEF
ON CROSS-APPEAL (FIRST
REQUEST)**

16 Appellant Ton Vinh Lee, an individual, by and through his counsel of record, Prescott T.
17 Jones, Esq. and Myraleigh Alberto McGill, Esq. of Resnick & Louis, P.C., hereby submits this
18 Motion for Extension of Time to File Combined Reply Brief on Appeal and Answering Brief on
19 Cross-Appeal (First Request) in the above-captioned matter pursuant to NRAP 31(b)(3).

20 Appellant's Combined Reply Brief on Appeal and Answering Brief on Cross-Appeal is
21 currently due on May 19, 2022. No previous extensions for Appellant's Combined Reply Brief
22 on Appeal and Answering Brief on Cross-Appeal have been requested or granted in this case.
23 Appellant requests an extension of thirty (30) days to file his Combined Reply Brief on Appeal
24 and Answering Brief on Cross-Appeal. If the requested extension is granted, Appellant's
25

1 Combined Reply Brief on Appeal and Answering Brief on Cross-Appeal would be due on June
2 20, 2022.

3 Good cause exists for Appellant's requested extension. The handling attorney for this
4 appeal has been on maternity leave and has just returned to the office on May 16, 2022. As a
5 result, Appellant also requires additional time to complete the Combined Reply Brief on Appeal
6 and Answering Brief on Cross-Appeal.

7 This Motion is submitted in good faith and for good cause shown in accordance with
8 NRAP 31(b). For the foregoing reasons, Appellant respectfully requests a thirty (30) day
9 extension of time, until June 20, 2022, to file and serve his Combined Reply Brief on Appeal and
10 Answering Brief on Cross-Appeal.

11 DATED this 19th day of May, 2022.

12 **RESNICK & LOUIS, P.C.**

13 */s/ Prescott T. Jones*

14 _____
PRESCOTT T. JONES, ESQ.

Nevada Bar No. 11617

15 MYRALEIGH ALBERTO MCGILL, ESQ.

Nevada Bar No. 14340

16 8925 W. Russell Road, Suite 220

Las Vegas, NV 89148

17 *Attorneys for Appellant*

18 *Ton Vinh Lee*