

1 **RESNICK & LOUIS, P.C.**
2 PRESCOTT T. JONES
3 Nevada Bar No. 11617
4 pjones@rlattorneys.com
5 MYRALEIGH ALBERTO MCGILL
6 Nevada Bar No. 14340
7 mmcgill@rlattorneys.com
8 8925 W. Russell Road, Suite 220
9 Las Vegas, Nevada 89148
10 Telephone: (702) 997-3800
11 Facsimile: (702) 997-3800
12 *Attorneys for Appellant*
13 *Ton Vinh Lee*

Electronically Filed
Jun 17 2022 11:38 a.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
14 LAW GROUP, PLLC, a Nevada Professional
15 LLC,

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 (SECOND
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 (Second 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 June 20, 2022. On May 19, 2022, this Court granted a thirty (30) day extension
22 of the deadline for Appellant's Combined Reply Brief on Appeal and Answering Brief on Cross-
23 Appeal. This was the only prior extension requested by the Appellant.

1 Appellant now requests an additional extension of thirty (30) days to file his Combined
2 Reply Brief on Appeal and Answering Brief on Cross-Appeal. If the requested extension is
3 granted, Appellant's Combined Reply Brief on Appeal and Answering Brief on Cross-Appeal
4 would be due on July 20, 2022.

5 Good cause exists for Appellant's requested extension. There are two appeals currently
6 before the Court arising from this case. The Court recently heard oral arguments for the appeal of
7 the District Court's grant of motion of summary judgment (Case No. 82516), and the Court's
8 decision on that appeal is pending. Counsel has focused efforts on preparation for the oral
9 argument in Case No. 82516 and now needs additional time to complete Appellant's Combined
10 Reply Brief on Appeal and Answering Brief on Cross-Appeal, and accompanying appendix.

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

15 DATED this 17th June of June, 2022.

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

17 */s/ Prescott T. Jones*

18

PRESCOTT T. JONES, ESQ.

Nevada Bar No. 11617

19 MYRALEIGH ALBERTO MCGILL, ESQ.

Nevada Bar No. 14340

20 8925 W. Russell Road, Suite 220

Las Vegas, NV 89148

21 *Attorneys for Appellant*

22 *Ton Vinh Lee*