

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

EDGEWORTH FAMILY TRUST; AND  
AMERICAN GRATING, LLC

Appellants/Cross-Respondents,

vs.

DANIEL S. SIMON; AND THE LAW  
OFFICE OF DANIEL S. SIMON, A  
PROFESSIONAL CORPORATION,

Respondents/Cross-Appellants.

Supreme Court Case No. 83258  
Electronically Filed  
Feb 23 2022 10:34 a.m.  
Consolidated with Elizabeth A. Brown  
Clerk of Supreme Court  
Supreme Court Case No. 83260

(District Court A-18-767242-C  
Consolidated with  
A-16-738444-C)

**MOTION FOR EXTENSION OF TIME FOR FILING OF ANSWERING  
BRIEF**

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*Attorney for Law Office of Daniel S. Simon and Daniel S. Simon*

The Law Office of Daniel S. Simon and Daniel S. Simon (hereinafter “Simon”) hereby moves for a 30-day extension of time for filing an Answering Brief.

Pursuant to NRAP 26(b), Simon requests an extension of time from February 26, 2022, up to and including March 28, 2022, (30 days) in which to file their Answering Brief. Simon has been diligently working on preparation of the brief but requires additional time to complete the brief to provide this Court with a well written response and to address cross over issues raised in the related Writ proceeding. This request is not an attempt to delay or prolong the appellate proceedings and will not cause undue delay.

Therefore, the Answering Brief would then be due on or before March 28, 2022. As such, Respondents respectfully request that their motion be granted.

Dated this 23<sup>rd</sup> day of February 2022.

/s/ James R. Christensen

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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 23<sup>rd</sup> day of February 2022, I served a copy of the foregoing MOTION FOR EXTENSION OF TIME FOR FILING AN ANSWERING BRIEF electronically to all registered parties.

/s/ Dawn Christensen  
an employee of JAMES R. CHRISTENSEN