

IN THE SUPREME COURT OF THE STATE OF NEVADA

IN THE MATTER OF THE ESTATE OF
MARILYN WEEKS SWEET,
DECEASED.

CHRISTY KAY SWEET,
Appellant,

v.

CHRIS HISGEN,
Respondent.

Supreme Court No. 83342

District Court No. P-20-103340-E
Electronically Filed
Jan 31 2022 01:46 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

**UNOPPOSED MOTION TO EXTEND TIME TO FILE OPENING BRIEF
AND SUPPLEMENTAL APPENDIX TO RECORD ON APPEAL
(SECOND REQUEST)**

Pursuant to NRAP 26(b)(1)(A), Appellant Christy Sweet (“Appellant”), by and through her pro bono counsel, Michael N. Feder of the law firm of Dickinson Wright, PLLC, appointed by Legal Aid of Southern Nevada, Inc. to represent Appellant in this matter in conjunction with the Partners in Pro Bono Project between Legal Aid of Southern Nevada and UNLV Boyd School of Law, respectfully moves the Court for a thirty-nine (39) day extension of time, to and including Friday, March 11, 2021, to file her Opening Brief and Supplemental Appendix to Record on Appeal.

Although pro bono counsel for Appellant, along with the assigned student, have been working diligently on the Opening Brief, more time is needed to complete

the Opening Brief. In addition to scheduling and COVID related conflicts, this case involves issues of first impression regarding the enforcement and interpretation of an international will in Nevada.

Moreover, as referenced, pro bono counsel is working on this matter with a law student from UNLV Boyd School of Law pursuant to the Partners in Pro Bono program who has had scheduling conflicts as well, including her class schedule.

Based on the foregoing, pro bono counsel for Appellant will not be able to submit a completed brief by the current deadline of February 1, 2022. Appellant therefore respectfully requests a thirty-nine (39) day extension of time, to and including March 11, 2021, to file the Opening Brief and Supplemental Appendix to Record on Appeal.

This is Appellant's second request for an extension of the time to file an Opening Brief and Supplemental Appendix to Record on Appeal. While pro bono counsel is hopeful that the full thirty-nine (39) day extension will not be needed, pro bono counsel for Appellant is requesting thirty-nine (39) days in an abundance of caution.

Pro bono counsel has communicated with Thomas R. Grover, Respondent's counsel, who has no objection to, and does not oppose, this requested extension of time.

Accordingly, Appellant respectfully requests that the Court grant the requested extension of time.

DATED this 31st day of January, 2022.

Respectfully submitted,

DICKINSON WRIGHT PLLC

/s/: Michael N. Feder

MICHAEL N. FEDER

Nevada Bar No. 7332

3883 Howard Hughes Parkway, Suite 800

Las Vegas, NV 89169

Tel: (702) 550-4400

Fax: (844) 670-6009

Email: mfeder@dickinson-wright.com

*Pro Bono Attorneys for Appellant,
Christy Kay Sweet*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 31st day of January, 2022, I served a copy of the foregoing **UNOPPOSED MOTION TO EXTEND TIME TO FILE OPENING BRIEF AND SUPPLEMENTAL APPENDIX TO RECORD ON APPEAL (SECOND REQUEST)** via the Supreme Court of Nevada's E-filing system, in compliance with Nevada Rules of Appellate Procedure and Rule 9 of the Nevada Electronic Filing and Conversion Rules, to the following counsel of record:

Michael A. Olson, Esq.
mike@blackrocklawyers.com
Thomas R. Grover, Esq.
tom@blackrocklawyers.com
Blackrock Legal
10155 W. Twain Avenue, Suite 100
Las Vegas, NV 89147

*Attorneys for Respondent,
Chris Hisgen*

/s/: Dianne M. Kelling
An Employee of Dickinson Wright PLLC