

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

2
3 ROBERT WILLIAM REYNOLDS,

4 Appellant,

5 vs.

6 SUSAN VICTORIA REYNOLDS,

7 Respondent.

No.: 83473

Electronically Filed
Feb 22 2022 09:01 p.m.

Elizabeth A. Brown
Clerk of Supreme Court

**MOTION TO EXTEND TIME TO
FILE OPENING BRIEF
(First Written Request)
(No Telephonic Extension)**

8 Comes now Appellant, Robert Reynolds, by and through his counsel, F.
9 Peter James, Esq., who hereby requests this Honorable Court to extend the time
10 to file the Opening Brief.

11 **POINTS AND AUTHORITIES**

12 Appellant is requesting to extend the time to file the Opening Brief.
13 Requests for relief must be made by motion absent another way prescribed by
14 rule. *See* NRAP 27(a)(1). Motions to extend briefing are not favored. *See* NRAP
15 31(b)(3). Generally, a request for an extension of time to file a document must
16 be made before the deadline has passed. *See* NRAP 31(b)(3). For good cause
17 shown, however, the Court may extend the time for filing a brief even after the
18 deadline has passed. *See* NRAP 26(b)(1)(A).

1 Appellant could have requested a 14 day telephonic extension; however,
2 the Appellant believed the brief could have been finished today, so no telephonic
3 extension was requested. The appendix was filed earlier today.

4 Here, there are several bases in support of extending the briefing timeline.
5 Appellant's counsel (hereinafter "Counsel") is unable to work as much at present
6 due to neck and back injuries from two different car accidents in less than 18
7 months. Counsel is treating 2x a week for these injuries with a physical therapist.

8 To compound things, Counsel's father, a highly-decorated USAF veteran,
9 has been in and out the hospital with multiple issues—cancer that spread from
10 the prostate to his hip and lymph nodes, a urinary tract infection that is now
11 antibiotic resistant, and other related health problems. Counsel has had to take
12 time to assist his mother, who is 89 years old. Counsel's father now needs to be
13 moved into a nursing home as his Medicare benefits are dwindling. Counsel is
14 looking into VA benefits, but the process is long and arduous. All of this has
15 taken Counsel out of the office.

16 The initial deadline is today. Appellant is requesting until March 8, 2022
17 as the deadline. Counsel has two trials in the interim, which are going forward.
18 Counsel also has other major deadlines next week, else a shorter extension would
19 have been requested.

1 The Court should find good cause to extend the briefing schedule until
2 March 8, 2022. Counsel believes this should be adequate time to finalize things.
3 There is no prejudice to Respondent who has an active judgment to collect upon.

4 **CONCLUSION**

5 Accordingly, the Court should extend the briefing schedule until March 8,
6 2022.

7 Dated this 22nd day of February, 2022

8 /s/ *F. Peter James*

9

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12 Counsel for Appellant

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Ryan Hamilton, Esq.
Counsel for Respondent