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Electronically Filed
Aug 09 2021 08:48 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

IN THE SUPREME COURT OF THE STATE OF NEVADA

Erich M. Martin,

Appellant,

vs.

Raina L. Martin,

Respondent.

Case No.: 81810/82517

Appeal from the Eighth Judicial District
Court, The Honorable Rebecca L.
Burton Presiding.

MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF
(First Request)

MAC:16211-001 4439356_1

Appellant, Erich M. Martin (“Erich”), by and through his counsel of record, Marquis Aurbach Coffing, hereby moves this Court pursuant to NRAP 31(b) for a 30-day extension of time to file his reply brief.

Erich’s reply brief is due on August 9, 2021. If this Court grants this request for a 30-day extension, Erich’s reply brief will be due on September 8, 2021. Good cause exists for allowing Erich to extend the filing deadline until September 8, 2021.

During the week of August 2, 2021, lead appellate counsel, Kathleen Wilde, unexpectedly had to address an emergency at home, namely, the failure of an air conditioning system. Given the summer heat, the situation necessitated an immediate response that could not be postponed.

The home emergency came at a particularly inopportune time, as Ms. Wilde was retained at the end of July to address expedited discovery and a preliminary injunction hearing that took place on August 4, 2021.

Briefing in this matter has also required additional time because of the novel issues of law and the eleven volumes of appendices that Ms. Martin filed with her answering brief.

An extension of 30 days will allow time the reply brief to be completed and reviewed, and will allow for time to make any requested revisions prior to filing the reply brief with this Court.

Therefore, Erich respectfully asks that this Court grant his motion for a 30-day extension until September 8, 2021. This Motion is submitted in good faith and for good cause shown in accordance with NRAP 31(b).

Dated this 9th day of August, 2021.

MARQUIS AURBACH COFFING

By /s/ Kathleen A. Wilde
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF** was filed electronically with the Nevada Supreme Court on the 9th day of August, 2021. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Marshal S. Willick, Esq.

/s/ Leah Dell _____
Leah Dell, an employee of
Marquis Aurbach Coffing