

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

2  
3                   JASWINDER SINGH,

4                                   Appellant,

5                   vs.

6                   RAJWANT KAUR,

7                                   Respondent.

No.: 83613

Electronically Filed  
Feb 15 2022 09:20 p.m.

Elizabeth A. Brown  
Clerk of Supreme Court

**MOTION TO EXTEND TIME TO  
FILE OPENING BRIEF  
(First Written Request)  
(Oral Request Granted)**

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

12                                   **POINTS AND AUTHORITIES**

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

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

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

13 To further add to these issues, Counsel is having computer issues which  
14 took several hours to resolve.

15 A telephonic extension was granted, which left the deadline as today.  
16 Appellant is requesting until March 1, 2022 as the deadline. Counsel has two  
17 trials in the interim, which are going forward.

18 The Court should find good cause to extend the briefing schedule until  
19 March 1, 2022. Counsel believes this should be adequate time to finalize things.  
20

1 There is no prejudice to Respondent, who waited over 14 years to attempt to set  
2 aside the decree. Another few weeks pale in comparison.

3 **CONCLUSION**

4 Accordingly, the Court should extend the briefing schedule until March 1,  
5 2022.

6 Dated this 15<sup>th</sup> day of February, 2022

7 /s/ *F. Peter James*

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11 Counsel for Respondent / Cross-Appellant

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1 **CERTIFICATE OF SERVICE**

2 The following are listed on the Master Service List and are served via the  
3 Court's electronic filing and service system (eFlex):

4 Israel Kunin  
5 Settlement Conference Judge

6 I certify that on this 15<sup>th</sup> day of February, 2022, I caused the above and  
7 foregoing document to be served by placing same to be deposited for mailing in  
8 the United States Mail, in a sealed envelope upon which first class postage was  
9 prepaid in Las Vegas, Nevada to the attorney(s) / party(ies) listed below at the  
10 address(es) indicated below:

11 Andrew Kynaston, Esq.  
12 3303 Novat Street, Suite 200  
13 Las Vegas, Nevada 89129  
14 Co-Counsel for Appellant

14 By: */s/ F. Peter James*

15 \_\_\_\_\_  
16 An employee of the Law Offices of F. Peter James, Esq., PLLC  
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