

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
May 12 2022 02:56 p.m.

Elizabeth A. Brown
Clerk of Supreme Court

**MOTION TO EXTEND TIME TO
FILE REPLY BRIEF
(First Written Request)**

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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 Reply Brief.

12 **POINTS AND AUTHORITIES**

13 Appellant is requesting to extend the time to file the Reply Brief. Requests
14 for relief must be made by motion absent another way prescribed by rule. *See*
15 NRAP 27(a)(1). Motions to extend briefing are not favored. *See* NRAP 31(b)(3).
16 Generally, a request for an extension of time to file a document must be made
17 before the deadline has passed. *See* NRAP 31(b)(3). For good cause shown,
18 however, the Court may extend the time for filing a brief even after the deadline
19 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 Counsel has recently undergone two rounds of steroid injections for the disc
6 issues and three rounds of nerve blocks (3 levels, 6 levels, 7 levels) for facet joint
7 diagnoses. Counsel is not seeking a second opinion as to how to proceed.

8 To compound things, Counsel’s father, a highly-decorated USAF veteran,
9 has been diagnosed with Stage 4 cancer that has spread to numerous areas. He is
10 considered terminal. Counsel has had to take time to assist his mother, who is 89
11 years old. All of this has taken Counsel out of the office.

12 A telephonic extension was granted, which left the deadline as tomorrow,
13 May 13, 2022. Appellant is requesting until Friday, May 27, 2022 as the
14 deadline. Counsel has several trials and other major deadlines in between.
15 Counsel is also taking a short weekend vacation for the first time in almost a year.

16 The Court should find good cause to extend the briefing schedule until
17 May 27 2022. Counsel believes this should be adequate time to finalize things.
18 There is no prejudice to Respondent, who waited over 14 years to attempt to set
19 aside the decree. Another few weeks pale in comparison.

1 **CONCLUSION**

2 Accordingly, the Court should extend the briefing schedule until March 1,
3 2022.

4 Dated this 12th day of May, 2022

5 */s/ F. Peter James*

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9 Counsel for Appellant

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CERTIFICATE OF SERVICE

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

- Israel Kunin
Settlement Conference Judge

- Racheal H. Mastel, Esq.
Counsel for Respondent

I certify that on this 12th day of March, 2022, I caused the above and foregoing document to be served by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada to the attorney(s) / party(ies) listed below at the address(es) indicated below:

- Andrew Kynaston, Esq.
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Co-Counsel for Respondent

By: */s/ F. Peter James*

An employee of the Law Offices of F. Peter James, Esq., PLLC