

IN THE SUPREME COURT OF THE STATE OF NEVADA

THOMAS WALKER, AN INDIVIDUAL

Appellant,

vs.

FLOYD WAYNE GRIMES; WBG TRUST; ELIZABETH GRIMES; VICTORIA JEAN HALSEY; JALEE ARNONE; AND PETER ARNONE,

Respondents.

Supreme Court No.: 83284
Electronically Filed
Nov 12 2021 03:06 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

RESPONDENTS' RESPONSE TO MOTION TO EXTEND TIME

Pursuant to NRAP 27(a)3, Respondents, FLOYD WAYNE GRIMES; WBG TRUST; ELIZABETH GRIMES; VICTORIA JEAN HALSEY; JALEE ARNONE; AND PETER ARNONE ("Respondents"), hereby provides its Response to Motion to Extend Time, filed by Appellant THOMAS WALKER'S ("Appellant"). Respondents' Response is based upon the memorandum of points and authorities and filings on this Court's docket.

MEMORANDUM OF POINTS AND AUTHORITIES

Appellant's Motion seeking an order extending time to file his motion to vacate must be denied.

Pursuant to the Court's Order of October 12, 2021, a thirty (30) day extension was granted for the WBG TRUST ("Trust") to obtain counsel. NRAP 27(b) provides that a "party adversely affected by the court's, or the clerk's, action may file a motion to reconsider, vacate or modify that action." NRAP 27(c)(3)(A) further provides the motion must be filed within fourteen (14) days after entry of

the order. Therefore, Appellant's time to file its motion expired on October 26, 2021.

On October 27, 2021, our firm filed its Notice of Appearance on behalf of all Respondents. Appellant's apparent argument that it was not adversely affected by the order, but rather the Trust's compliance with the order is logically without merit. Assuming Appellant was adversely affected, the adverse affect would have accrued on the date of the order, not on the date the Trust complied with the order. Therefore, Appellant's Motion is untimely and should be denied.

Furthermore, the underlying goal of Appellant's Motion is to deny the Trust access to counsel and the Court and as the Court has previously stated "society's right to meaningful court access is significant, and such right should not be lightly constrained." *Jordan v. State ex rel. DMV & Pub. Safety*, 121 Nev. 44, 76, 110 P.3d 30, 52, 2005.

CONCLUSION

Respondents respectfully requests this Court deny the Motion to Extend Time filed by the Appellant. The Motion is untimely and contrary to this Court's precedent.

Dated: November 12, 2021

THE URBAN LAW FIRM

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CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of November 2021, I filed the foregoing **Respondent's Response to Motion to Extend Time**, via the Court's e-filing service system.

I hereby certify that a copy of the aforementioned document was sent via U.S. mail, prepaid postage, and via email upon the following:

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Appellant

/s/ April Denni
An Employee of The Urban Law Firm