

IN THE SUPREME COURT OF THE STATE OF NEVADA

EDGEWORTH FAMILY TRUST; AND
AMERICAN GRATING, LLC

Appellants/Cross-Respondents,

vs.

DANIEL S. SIMON; AND THE LAW
OFFICE OF DANIEL S. SIMON, A
PROFESSIONAL CORPORATION,

Respondents/Cross-Appellants.

Supreme Court Case No. 84367
Electronically Filed
Jun 09 2022 10:57 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

(District Court A-18-767242-C
Consolidated with
A-16-738444-C)

MOTION FOR EXTENSION OF TIME FOR FILING OF REPLY BRIEF

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Attorney for Law Office of Daniel S. Simon and Daniel S. Simon

The Law Office of Daniel S. Simon and Daniel S. Simon (hereinafter “Simon”) hereby moves for an additional 30-day extension of time for filing a Reply Brief.

Pursuant to NRAP 26(b), Simon requests an extension of time from June 10, 2022, up to and including July 11, 2022, (30 days) in which to file their Reply Brief. Simon’s appellate counsel is a sole practitioner. Counsel fell ill on May 26 and tested positive for COVID on May 27 on a home test. Counsel has had continued symptoms which prevent work on lengthy or complicated legal matters through the date of filing this request. On May 31 & June 7 counsel continued to test positive via Southern Nevada Health District testing.

Simon had been diligently working on preparation of the brief; this illness has brought that work to a halt. It is respectfully submitted that the illness of counsel demonstrates good cause for a second extension of time. Additional time is needed to complete the brief to provide this Court with a well written response. This request is not an attempt to delay or prolong the appellate proceedings and will not cause undue delay.

Therefore, the Reply Brief would then be due on or before July 11, 2022. As such, Petitioner respectfully request that their motion be granted.

Dated this 9th day of June 2022.

/s/ James R. Christensen
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 9th day of June 2022, I served a copy of the foregoing MOTION FOR EXTENSION OF TIME FOR FILING A REPLY BRIEF electronically to all registered parties.

/s/ Dawn Christensen
an employee of JAMES R. CHRISTENSEN