

1 IN THE SUPREME COURT OF THE STATE OF NEVADA

2
3 GABRIEL J. DALEY

4 Appellant,

5 Vs.

6 ENCORE GROUP OF PROFESSIONALS, LLC,

7 ENCORE GROUP OF CALIFORNIA, LLC

8 ENCORE GROUP OF NEVADA, LLC

9 ENCORE GROUP OF TEXAS, LLC

10 ENCORE GROUP OF HAWAII, LLC

11 JOHN JACKSON;

12 TERRY JACKSON;

13 Respondents.

Supreme Court No. 84745

District Court No. A735644

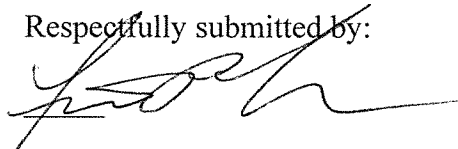
Electronically Filed
Jul 07 2022 05:52 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

14 **MOTION FOR EXTENSION OF TIME TO FILE DOCKETING STATEMENT**

15 COMES NOW, Timothy P. Thomas, Esq., attorney for Appellant, GABRIEL J. Daley,
16 moves this Court for an Order granting an extension of time of ten (10) days from the date the
17 Docketing Statement is due, to wit: June 29, 2022, and extend the time to and including, ten (10)
18 days, for filing of the Docketing Statement. This motion is made and based upon NRAP 26 and
19 27, the Declaration of Timothy P. Thomas, Esq., filed herewith, and the Points and Authorities
20 attached hereto.
21

22 DATED this 7th day of July, 2022.

23 Respectfully submitted by:

24 

25 Timothy P. Thomas, Esq.
26 1771 E. Flamingo Rd., Ste. B-212
27 Las Vegas, NV 89119
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POINTS AND AUTHORITIES

Time for serving and Filing Docketing Statement was set by Notice issued on June 22, 2022 stating:

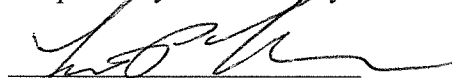
Appellant shall file the docketing statement with the Clerk of the Supreme Court within 7 days of the date of this notice. See NRAP 14. An original and 2 copies shall be filed, together with proof of service on all parties. NRAP 14(b). Failure to file a docketing statement may result in the imposition of sanctions, including the dismissal of this appeal. NRAP 14(c).

Gabriel J. Daley Docketing Statement was currently due on June 29, 2022. This is the first request for an extension of time. The instant case is an appeal from the district court's *granting Judgment on Motion to Enforce Settlement Agreement for Plaintiff and Third-Party Defendants, and award of attorney's fees and costs.*

The notice was inadvertently calendared for 14 days from June 22, 2022 i.e. July 6, 2022. Counsel discovered the error and prepared to file the docketing statement on July 6, 2022. The filing was rejected. Counsel seeks to refile the docketing statement. Counsel respectfully request that this court permit him ten (10) days to properly draft and submit the docketing statement based upon excusable request.

DATED this 7th day of July, 2022.

Respectfully submitted by:


Timothy P. Thomas, Esq.

I, TIMOTHY P. THOMAS, ESQ., being first duly sworn, deposes and states:

2. The notice was inadvertently calendared for 14 days from June 22, 2022 i.e. July 6, 2022. Counsel discovered the error and prepared to file the docketing statement on July 6, 2022. The filing was rejected. Counsel seeks to refile the docketing statement.

4. That this motion is made in good faith and not for purposes of delay.

DATED this 7th day of July, 2022.

- 3 -

CERTIFICATE OF SERVICE

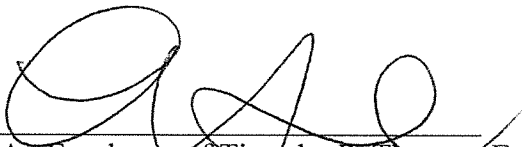
I hereby certify and affirm that this document was filed electronically with the Supreme Court of the State of Nevada on July 07, 2022. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Phil Emerson, Esq.
EMERSON LAW GROUP
1055 Whitney Ranch Drive, Suite 120
Henderson, NV 89014
Kent Woods, Esq.

LAW OFFICE OF KENT WOODS, LLC
197 E. California Ave #300
Las Vegas, NV 89104
Janet Trost, Esq.

SUPREME COURT OF NEVADA, CLERKS OFFICE
201 S CARSON STREET, SUITE 201
CARSON CITY, NV 89701

BY:


An Employee of Timothy P. Thomas, Esq.