

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

JOHN DATTALA,

Appellant,

vs.

PRECISION ASSETS, LLC; ACRY  
DEVELOPMENT LLC; AND WFG  
NATIONAL TITLE INSURANCE  
COMPANY,

Respondents.

No. 84762

Electronically Filed  
Sep 20 2022 04:31 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**MOTION FOR EXTENSION OF TIME TO FILE ANSWERING  
BRIEF OF RESPONDENT PRECISION ASSETS, LLC  
(First Request)**

Respondent Precision Assets, LLC (“Respondent”) respectfully moves this Court, pursuant to NRAP 31(b) for an extension of 60 days in which to file its answering brief.

Respondent’s answering brief is currently due September 20, 2022. This is Respondent’s first motion for extension of time. No request for additional time has been denied or denied in part. If this Court grants this request for an extension of 60 days, Respondent’s answering brief will be due on Monday, November 21, 2022.

Good cause exists to grant the requested extension for the following reasons:

1. Respondent retained appellate counsel, Micah S. Echols and David P. Snyder, last week, and they just appeared in this appeal on September 19, 2022.

2. On August 21, 2022, Appellant filed an opening brief of approximately 41 pages, along with a joint appendix that consists of 9 volumes.

3. As new counsel to this case, Mr. Echols and Mr. Snyder will need to familiarize themselves with the record and the legal arguments raised in the opening brief to adequately prepare the answering brief.

4. Prior to being retained for this appeal, Mr. Echols and Mr. Snyder had several briefing deadlines coming due within the next several weeks in Supreme Court cases *In re: Guardianship of Jones*, No. 83967; *Smedal, III v. The Winnemucca Hotel, LLC*, No. 83966; *R.J. Reynolds Tobacco Co. v. Dist. Ct.* (Camacho), No. 83724; *Hoy v. Castellon*, No. 84521; *Kyung Chang Ind. USA, Inc. v. Dist. Ct.* (Green), No. 84844; and United States Court of Appeals for the Ninth Circuit, *Smith v. Heights of Summerlin, LLC*, No. 22-15003. Additionally, Mr. Echols and Mr. Snyder will attend a Ninth Circuit oral argument in Seattle Washington, scheduled for October 4, 2022 in *Herndon v. M. Gillis*, No. 21-16720.

5. Due to these prior deadlines, it will be several weeks before appellate counsel will have the opportunity to review the necessary records, the legal arguments, and the briefing before this Court to prepare Respondent's answering brief. Even without counsel's case load, the size of the opening brief (which presents 6 issues) and the record warrant an extension.

Therefore, Respondent respectfully requests a 60-day extension of time, until November 21, 2022, within which to file its answering brief. This motion is submitted in good faith and for good cause shown in accordance with NRAP 26(b)(1)(B).

Dated this 20th day of September 2022.

CLAGGETT & SYKES LAW FIRM

/s/ Micah S. Echols

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## **CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing **MOTION FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF OF RESPONDENT PRECISION ASSETS, LLC (First Request)** with the Supreme Court of Nevada on the 20th day of September 2022. I will electronically serve the foregoing document in accordance with the Master Service List as follows:

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