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2 BYRON E. THOMAS. ESQ.  
3 Nevada Bar No. 8906  
4 3275 S. Jones Blvd. Ste. 104  
5 Las Vegas, Nevada 89146  
6 Phone: 702 747 3103  
7 [byronthomaslaw@gmail.com](mailto:byronthomaslaw@gmail.com)  
8 Attorney for Appellants

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Jul 10 2023 06:54 PM  
Elizabeth A. Brown  
Clerk of Supreme Court

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

10 \*\*\*

11 ZION WOOD OBI WAN TRUST AND  
12 SHAWN WRIGHT AS TRUSTEE OF  
13 THE ZION OBI WAN TRUST

14 Appellant

15 vs.

16 MMAWC, LLC d/b/a WORLD SERIES  
17 OF FIGHTING a Nevada Limited  
18 Liability Company; MMAX  
19 INVESTMENT PARTNERS d/b/a  
20 PROFESSIONAL FIGHTERS  
21 LEAGUE; NANCY and BRUCE  
22 DEIFIK FAMILY PARTNERSHIP,  
23 LLP., a Colorado limited liability  
24 partnership

25 Respondent

) Supreme Court Case No:

) 85051

) District Court Case No:

) A-17-764118-C

) **APPELLANT'S MOTION**  
) **TO EXTEND TIME TO FILE**

) **REPLY BRIEF**  
) **(FIFTH REQUEST)**

COMES NOW, ZION WOOD OBI WAN TR. AND IT'S TRUSTEE SHAWN  
WRIGHT ("Appellant") through counsel files this Motion to Extend Time to File  
Reply Brief (the "Motion") pursuant to NRAP 31(b).

## MEMORANDUM OF POINTS AND AUTHORITIES

### ARGUMENT

Appellant seeks an extension of time to file its opening brief based on  
extraordinary circumstances. NRAP 27 and NRAP 31(b)(3) permit a party to file a  
motion to seek "an extension of time to file a brief."

NRAP 31(b)(3) states as follows:

(3) Motions for Extensions of Time. A motion for extension of time  
for filing a brief may be made no later than the due date for the brief  
and must comply with the provisions of this Rule and Rule 27.

(A) Contents of Motion. A motion for extension of time for  
filing a brief shall include the following:

(i) The date when the brief is due;

(ii) The number of extensions of time previously granted  
(including a 14-day telephonic extension), and if extensions were  
granted, the original date when the brief was due;

(iii) Whether any previous requests for extensions of time have  
been denied or denied in part;

(iv) The reasons or grounds why an extension is necessary  
(including demonstrating extraordinary circumstances under Rule  
26(b)(1)(B), if required).

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2 **1. The Date When the Brief is Due:**

3 Appellant's Reply Brief is due July 10, 2023.  
4

5 **2. The number of extensions of time previously granted**  
6 **were partially granted, the original date when the brief was due**

7 Appellant was granted a two week telephonic extension by the Clerk of the  
8 Court. The Court has granted 3 subsequent motions to extend the deadline to file the  
9 Reply. The original due date was May 22, 2023.  
10

11 **3. Whether any previous requests for extensions of time have been**  
12 **denied or denied in part.**

13  
14 The Court has not denied any previous requests for extension.  
15

16 **4. The reasons or grounds why an extension is necessary (including**  
17 **demonstrating extraordinary and compelling circumstances under Rule**  
18 **26(b)(1)(B), if required)**

19 Counsel for Appellant is still having eye problems, although they have  
20 improved. Counsel has had to reduce his work schedule, and thus needs additional  
21 time to complete the Reply. In an abundance of caution Appellant requests an  
22 additional eight (8) days, so as to not have to make another request.  
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1     **The length of the extension requested and the date on which the**  
2  
3     **brief would become due.**

4             Appellant requests an additional eight (8) day extension from today, to  
5     July 18, 2023.

6  
7             DATED this 17th day of July, 2023.

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9                             /s/ Byron E. Thomas  
10                            BYRON THOMAS, ESQ.  
11                            Nevada Bar No. 8906  
12                            Law Offices of Byron Thomas  
13                            3275 S. Jones Blvd., Ste. 104  
14                            Las Vegas, Nevada 89146  
15                            (702) 347-3103  
16                            byronthomaslaw@gmail.com  
17                            Attorney for Appellant  
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1       **DECLARATION OF BYRON THOMAS IN SUPPORT OF MOTION**  
2       **TO EXTEND DEADLINE TO FILE OPENING BRIEF**

3       I Byron Thomas declare as follows pursuant to Nev. R. APP. P.31(b).

- 4
- 5       1. I am licensed to practice law in the State of Nevada and registered in this
- 6       court.
- 7       2. I am the counsel for Appellant in the above entitled case.
- 8
- 9       3. I am still having eye problems, although they have improved. I have had to
- 10       reduce my work schedule, and thus needs additional time to complete the
- 11       Reply. In an abundance of caution I request an additional eight (8) days, so as
- 12       to not have to make another request.
- 13

14       Under penalty of perjury under the laws of Nevada, I attest that the

15

16       foregoing statements are true and correct.

17       July 10, 2023

18                               /s/ Byron E. Thomas

19                               Byron E. Thomas

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3 **CERTIFICATE OF SERVICE**

4 I hereby certify that I electronically filed the foregoing Motion to  
5 Extend Time to File Reply Brief with the Clerk of the Court for the  
6 Supreme Court of Nevada by using the Court's electronic service system on  
7 July 10, 2023. A copy of the foregoing shall be electronically transmitted  
8 from the Court to the email addresses on file for each of the following:  
9

10 **Attorneys for Respondents**

11 Michael Feder  
12 Maximiliano Couvillier  
13 Gabriel Blumberg  
14

15  
16 Dated this 10th day of July 2023.  
17

18 */s/ Byron Thomas*  
19 \_\_\_\_\_

20 Law Offices of Byron Thomas  
21 Byron Thomas, Esq.  
22 Nevada Bar No. 8906  
23 3275 S Jones Blvd  
Las Vegas, NV 8914

24 Phone: (702) 747-3103  
25 [byronthomaslaw@gmail.com](mailto:byronthomaslaw@gmail.com)  
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