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Electronically Filed  
Jul 18 2023 08:29 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 )

Supreme Court Case No:  
85051

14 Appellant )

District Court Case No:  
A-17-764118-C

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 )

**APPELLANT'S MOTION**  
**TO EXTEND TIME TO FILE**  
**REPLY BRIEF**  
**(SIXTH REQUEST)**

25 Respondent )  
26 )  
27 )  
28 )  
29 )  
30 )  
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1  
2 COMES NOW, ZION WOOD OBI WAN TR. AND IT'S TRUSTEE SHAWN  
3  
4 WRIGHT ("Appellant") through counsel files this Motion to Extend Time to File  
5 Reply Brief (the "Motion") pursuant to NRAP 31(b).  
6

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8 **MEMORANDUM OF POINTS AND AUTHORITIES**

9 **ARGUMENT**

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11 Appellant seeks an extension of time to file its opening brief based on  
12 extraordinary circumstances. NRAP 27 and NRAP 31(b)(3) permit a party to file a  
13 motion to seek "an extension of time to file a brief."  
14

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

16  
17 (3) Motions for Extensions of Time. A motion for extension of time  
18 for filing a brief may be made no later than the due date for the brief  
19 and must comply with the provisions of this Rule and Rule 27.

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

22 (i) The date when the brief is due;

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

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

28 (iv) The reasons or grounds why an extension is necessary  
29 (including demonstrating extraordinary circumstances under Rule  
30 26(b)(1)(B), if required).  
31

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

3 Appellant's Reply Brief is due July 18, 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 4 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 The Court has not denied any previous requests for extension.  
14

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

18 Counsel for Appellant is still having eye problems. Appellant cannot view  
19 computer screens for long periods of time without extensive headaches, seeing  
20 flashes of lights and dark spots. The symptoms have improved however not to the  
21 degree counsel had hoped. Counsel has had to reduce his work schedule, and thus  
22 needs additional time to complete the Reply. Counsel has retained the assistance to  
23 complete the briefing so as to make this the final request. Appellant requests an  
24 additional one week extension, seven (7) days.  
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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 seven (7) day extension from today, to  
5     July 25, 2023.

6  
7             DATED this 18th day of July, 2023.

8  
9   /s/ Byron E. Thomas  
10    BYRON THOMAS, ESQ.  
11    Nevada Bar No. 8906  
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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 cannot view computer screens for long periods of time without extensive  
10 headaches, seeing flashes of lights and spots. The symptoms have improved  
11 however not to the degree I had hoped. I have had to reduce my work  
12 schedule, and thus needs additional time to complete the Reply. I have  
13 acquired assistance to complete the briefing so as to make this the final  
14 request. I request an additional one week extension, seven (7) days.

15  
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17 Under penalty of perjury under the laws of Nevada, I attest that the  
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19 foregoing statements are true and correct.

20 July 18, 2023

21 /s/ Byron E. Thomas  
22 Byron E. Thomas

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**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing Motion to Extend Time to File Reply Brief with the Clerk of the Court for the Supreme Court of Nevada by using the Court’s electronic service system on July 18, 2023. A copy of the foregoing shall be electronically transmitted from the Court to the email addresses on file for each of the following:

**Attorneys for Respondents**

Michael Feder  
Maximiliano Couvillier  
Gabriel Blumberg

Dated this 18th day of July 2023.

*/s/ Byron Thomas*

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