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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
8 Attorney for Appellants

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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

26) **Supreme Court Case No:**

27) 85051

28) **District Court Case No:**

29) A-17-764118-C

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

REPLY BRIEF
(SIXTH 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).

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.
25

26 ///

27 ///

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
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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**DECLARATION OF BYRON THOMAS IN SUPPORT OF MOTION
TO EXTEND DEADLINE TO FILE OPENING BRIEF**

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

1. I am licensed to practice law in the State of Nevada and registered in this court.
2. I am the counsel for Appellant in the above entitled case.
3. I cannot view computer screens for long periods of time without extensive headaches, seeing flashes of lights and spots. The symptoms have improved however not to the degree I had hoped. I have had to reduce my work schedule, and thus needs additional time to complete the Reply. I have acquired assistance to complete the briefing so as to make this the final request. I request an additional one week extension, seven (7) days.

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

July 18, 2023

/s/ Byron E. Thomas
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 18, 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 18th 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
24 Las Vegas, NV 8914

25 Phone: (702) 747-3103
26 byronthomaslaw@gmail.com
27
28
29
30
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