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Electronically Filed
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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

) Supreme Court Case No:

) 85051

) District Court Case No:

) A-17-764118-C

) **APPELLANT'S MOTION**
) **TO EXTEND TIME TO FILE**
) **REPLY BRIEF TO JULY 26,**
) **2023**
) **(SEVENTH 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 Appellant made a sixth request to extend the due date to July 25, 2023
10 which the Court has yet to rule upon. The original due date was May 22, 2023.
11

12 **3. Whether any previous requests for extensions of time have been**
13 **denied or denied in part.**
14

15 The Court has not denied any previous requests for extension.
16

17 **4. The reasons or grounds why an extension is necessary (including**
18 **demonstrating extraordinary and compelling circumstances under Rule**
19 **26(b)(1)(B), if required)**

20 Counsel for Appellant is still having eye problems. Appellant cannot view
21 computer screens for long periods of time without extensive headaches, seeing
22 flashes of lights and dark spots. The symptoms have improved however not to the
23 degree counsel had hoped. Counsel was not able to complete the Reply by July 25,
24 2023, even with additional assistance, thus Zion needs additional time to complete
25 the Reply. Zion requests a one day extension.
26
27

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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 one (1) day extension from today, to
5 July 26, 2023.

6
7 DATED this 25th day of July, 2023.

8
9 /s/ Byron E. Thomas
10 BYRON THOMAS, ESQ.
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15 (702) 347-3103
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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. Unfortunately I was not able to
- 12 complete it by July 25, 2023, even with additional assistance, and thus need one
- 13 (1) additional day.
- 14

15

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

17 foregoing statements are true and correct.

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19 July 25, 2023

20 /s/ Byron E. Thomas
21 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 25, 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 25th day of July 2023.

/s/ Byron Thomas

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