

IN THE SUPREME COURT OF THE STATE OF NEVADA

EDGEWORTH FAMILY TRUST; AND
AMERICAN GRATING, LLC

Petitioners,

vs.

CLARK COUNTY DISTRICT COURT,
THE HONORABLE TIERRA JONES,
DISTRICT JUDGE, DEPT. 10,

Respondents,

DANIEL S. SIMON; AND THE LAW
OFFICE OF DANIEL S. SIMON, A
PROFESSIONAL CORPORATION,

Real Parties in Interest.

Supreme Court Case No. 86467
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Elizabeth A. Brown
(District Court Clerk for the Court)

**MOTION FOR EXTENSION OF TIME TO FILE ANSWER TO WRIT
PETITION**

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Attorney for Law Office of Daniel S. Simon and Daniel S. Simon

The Law Office of Daniel S. Simon and Daniel S. Simon (hereinafter “Simon”) hereby moves for an additional 30-day extension of time for filing an Answer to the Petition for a Writ of Mandamus.

Pursuant to NRAP 26(b), Simon requests an extension of time from July 14, 2023, up to and including August 14, 2023, in which to file the Answer.

Simon believes that the Answer to the Writ Petition would benefit from review and submission of the transcript of the district court lien adjudication hearing held on March 21, 2023. Petitioners (the Edgeworths) requested the transcript on June 20, 2023, in their direct appeal. It is understood that the transcript will be prepared within 30 days of the filing of the request, or by July 20, 2023. Additional time will be needed following July 20 to draft the Answer (and in the event the transcript is delayed).

It is respectfully submitted that the pending transcript request constitutes good cause for an extension of time. This request is not an attempt to delay or prolong the appellate proceedings and will not cause undue delay.

Therefore, the Answer would be due on or before August 14, 2023.
As such, Simon respectfully requests that the motion be granted and that
the Simon Answer be due on or before August 14, 2023.

Dated this 10th day of July 2023.

/s/ James R. Christensen
JAMES R CHRISTENSEN, ESQ.
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Attorney for Simon

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 10th day of July 2023, I served a
copy of the foregoing REQUEST FOR EXTENSION OF TIME TO FILE
AN ANSWER TO WRIT OF MANDAMUS electronically to all registered
parties.

/s/ Dawn Christensen
an employee of JAMES R. CHRISTENSEN