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Elizabeth A. Brown
Clerk of Supreme Court

Attorneys for Appellants Edgeworth
Family Trust; American Grating, LLC

IN THE SUPREME COURT OF THE STATE OF NEVADA

EDGEWORTH FAMILY TRUST;
AMERICAN GRATING, LLC,

Appellants,

v.

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

Respondents.

Supreme Court Case Nos. 86676

District Court Case Nos.
A-16-738444-C and
A-18-767242-C

**REPLY IN SUPPORT OF MOTION
TO STAY BRIEFING OR
ALTERNATIVELY, FOR A 60-DAY
EXTENSION TO DEADLINE TO
FILE THEIR OPENING BRIEF**

Rather than focus on the procedural substance and scope of the motion before the Court, the Simon Respondents use their response as an opportunity to make attacks on the Edgeworths that are irrelevant to the motion. As to the stay of briefing on this appeal pending disposition of the pending writ petition in Case No. 86467, Simon confirms that he "does not

strictly oppose a stay." Resp. at 2. He also confirms that he "does *not* object to a 60-day continuance." Response at 2. The rest of Simon's response is consistent with the abusive manner in which he has treated his former clients for the past several years, which is irrelevant to this motion, has been addressed in other papers, and will not be addressed here.

For the reasons set forth in the motion, the Edgeworth Appellants respectfully ask that the Court stay briefing on this appeal pending disposition of the pending writ petition, or allow a 60-day extension to file their opening brief to allow their counsel to focus on unexpected family obligations and sufficient time to complete the brief and related documents.

MORRIS LAW GROUP

By: /s/STEVE MORRIS
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CERTIFICATE OF SERVICE

Pursuant to Nev. R. App. P. 25 and NEFR 9(f), I certify that I am an employee of Morris Law Group; that on this date I electronically filed the foregoing **REPLY ISO MOTION TO STAY BRIEFING OR ALTERNATIVELY, FOR A 60-DAY EXTENSION TO DEADLINE TO FILE THEIR OPENING BRIEF** with the Clerk of the Court for the Nevada Supreme Court by using the Nevada Supreme Court's E-Filing system (Eflex). Participants in the case who are registered with Eflex as users will be served by the Eflex system as follows:

TO:

James R. Christensen, Bar No. 3861
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Attorneys for Respondent Law Office of Daniel S. Simon, A Professional Corporation; and Daniel S. Simon

Dated this 28th day of September, 2023.

/s/ CATHY SIMICICH