

IN THE SUPREME COURT OF NEVADA

Case Nos. 58504, 59208 and 59423

JENNY RISH,

Appellant,

vs.

WILLIAM JAY SIMAO, individually; and
CHERYL ANN SIMAO, individually and as
husband and wife,

Respondents.

Electronically Filed
Apr 16 2012 03:34 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

MOTION FOR EXTENSION TO FILE OPENING BRIEF AND APPENDIX

Pursuant to NRAP 31(b)(3), appellant requests 30 days, up to and including May 16, 2012, in which to file its opening brief and appendix. The brief is due to be filed on April 16, 2012. This is Appellant's second motion for extension. (The deadline was previously extended by stipulation of the parties.)

Notwithstanding counsel's diligent efforts to complete the brief, extreme and unforeseeable circumstances have delayed its completion. First, finishing the brief depends partly on transcripts of bench conferences that have long been ordered, but have not yet been received. The staff of appellant's counsel has maintained constant contact with the court reporter and it is anticipated that the transcripts should be completed within the next 30 days. Secondly, completion also has been delayed by counsel's recent illness that included syncopal episodes resulting in a concussion, which in turn drew him away from the office for an unforeseeable and extended period of time.

Therefore, appellant respectfully requests an extension of 30 days in which to file its opening brief and appendix.

DATED this 16th day of April 2012.

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/s/ Joel D. Henriod

By: _____

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that this document was filed electronically with the Nevada Supreme Court on the 16th day of April, 2012, Electronic service of the foregoing MOTION FOR EXTENSION TO FILE OPENING BRIEF AND APPENDIX shall be made in accordance with the Master Service List as follows:

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