

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.

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Clerk of Supreme Court

MOTION TO EXCEED TYPE-VOLUME LIMITATION

Pursuant to NRAP 32(a)(7)(D), appellant moves for leave to file an opening exceeding the type-volume limitation set out in NRAP 32(a)(7)(A)(ii) by 6,136 words.

The brief is longer than normal because this case calls for detailed discussion of the record. For the Court's ease of reference, the brief contains a few quite lengthy quotations from the trial transcript. This is an unusual style but an effective one where the actual communications at trial are essential to understanding and resolving the issues. *See, e.g., Jitnan v. Oliver*, 127 Nev. ___, 254 P.3d 623 (2011) (per SAITTA, J.) (opinion uses extensive block quotes from the

trial). In this case, a longer brief actually may take less time to analyze than a shorter one that requires frequent resort to a separate appendix or transcript.

DATED this 15th day of August 2012.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that this document was filed electronically with the Nevada Supreme Court on the 15th day of August, 2012, electronic service of the foregoing MOTION TO EXCEED TYPE-VOLUME LIMITATION shall be made in accordance with the Master Service List as follows:

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