IN THE SUPREME COURT OF THE STATE OF NEVADA

JENNY RISH, Appellant, vs. WILLIAM JAY SIMAO, individually; and CHERYL ANN SIMAO, individually and as husband and wife, Respondent.	)	Case Nos. 58504 59208 59423

MOTION FOR EXTENSION OF TIME TO FILE RESPONDENTS' ANSWERING BRIEF

COMES NOW, Respondents, acting by and through their counsel, David T. Wall, of the law firm of Eglet Wall, and hereby move the Court to enter its order granting them a 30-day extension of time within which to file and serve their answering brief. Pursuant to NRAP 31(b)(3)(A), the following information is provided:

i. The answering brief is currently due on November 5, 2012;

ii. The previous due date for the answering brief was October 4, 2012, and one prior 30-day extension was obtained by stipulation;

iii. No previous extension requests have been denied, or denied in part;

iv. The reasons an extension is necessary is that the appellant's opening brief consists of 20,136 words and the appellant's appendix is comprised of 22 volumes consisting of over 5,000 pages. Moreover, the attention of Respondents' counsel has been required on other pressing matters, including a trial that lasted seven weeks in the

matter of *Damery v. Pizza Hut, et al*, Eighth Judicial District Court, Case No. A620078;

v. Respondents seek a 30-day extension, pursuant to which their answering brief would be due on December 5, 2012.

NRAP 31(b)(3)(B) provides that an extension of time, beyond which the parties are permitted to stipulate, will be granted upon a clear showing of good cause. The work on respondents' answering brief is proceeding, with significant progress having been made. This progress has been made despite the enormity of the project – opposing a brief that is nearly one-and-a-half times as long as allowed by NRAP 32(a)(7)(A)(ii) – and the very difficult circumstances caused by a difficult convergence of time-intensive deadlines. Lastly, it is not anticipated that Appellants would oppose this request.

Therefore, Respondents respectfully request an extension of 30 days in which to file its answering brief.

DATED this 5th day of November, 2012.

EGLET WALL

/s/David T. Wall
DAVID T. WALL, ESQ.
Nevada Bar No. 2805
400 South Fourth Street, Suite 600
Las Vegas, Nevada 89101
Attorney for Respondents

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that this document was filed electronically with the Nevada Supreme Court on the 5th day of November, 2012, Electronic service of the foregoing MOTION FOR EXTENSION TO FILE OPENING BRIEF shall be made in accordance with the Master Service List as follows:

Daniel F. Polsenberg
Joel D. Henriod
Lewis and Roca LLP
3993 Howard Hughes Parkway
Suite 600
Las Vegas, Nevada 89169

Stephen H. Rodgers
Rogers Mastrangelo Carvalho
& Mitchell
300 South Fourth Street, Suite 170
Las Vegas, Nevada 89101

s/Nick Vaglio
An Employee of Eglet Wall