

1 **EXPT**
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Elizabeth A. Brown
Clerk of Supreme Court

7 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

8 CRAIG THOMAS TIFFEE,
9 Appellant

CASE NO: 79871

10 vs.

11 EIGHTH JUDICIAL DISTRICT
12 COURT,

13 Respondent.

14 **EX-PARTE MOTION TO EXTEND TIME FOR REPLY TO**
15 **RESPONDENT'S ANSWERING BRIEF**

16
17 COMES NOW, Appellant, CRAIG THOMAS TIFFEE, by and through his
18 attorney of record, THOMAS C. MICHAELIDES, and moves this Honorable
19 Court for its Order granting his Ex-Parte Motion for the following:
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- 21 1. To extend the time to file the Reply to Respondent's Answering Brief;
22 and
23
24 2. For other related relief the Court deems just and proper.

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1 This Motion is based upon all of the pleadings and papers, the following
2 Points and Authorities.

3 DATED this 27th day of August, 2020.

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5 /s/ Thomas C. Michaelides
6 THOMAS C. MICHAELIDES, ESQ.
Nevada Bar No. 5425
Attorney for Appellant

7 Counsel for Appellant has been working from home during the Covid-19
8 Pandemic due to an illness and was unable to get information to his staff on time,
9 which made this Reply late by two days. Counsel is asking for an extension to
10 file the Reply.
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13 On motion and upon such terms as are just, the court may relieve a party or
14 his legal representative from a final judgment, order, or proceeding for the
15 following reasons:(1) mistake, inadvertence, surprise, or *excusable*
16 *neglect*;...The motion shall be made within a reasonable time, and ... not more
17 than six (6) months after the judgment, order, or proceeding was entered or
18 taken.” In this instant case, counsel feels the excusable neglect of during the
19 Pandemic should allow for more time to respond.
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22
23 DATED this 27th day of August, 2020.

24 TCMLAW GROUP

25
26 /s/ Thomas C. Michaelides
27 THOMAS C. MICHAELIDES, ESQ.
Nevada Bar No. 5425
Attorney for Appellant
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