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IN THE SUPREME COURT OF THE STATE OF NEVADA

DANIEL E. WOLFUS,

Appellant,

vs.

Electronically Filed
Supreme Court No. 2020-0013
Aug 19, 2020 9:58 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

KENNETH A. BRUNK; RICHARD D.
MORITZ; BRADLEY J. BLACKETOR;
TIMOTHY HADDON; MARTIN M.
HALE, JR.; et al.

Respondents.

DANIEL E. WOLFUS,

Appellant,

vs.

Supreme Court No. 80949

KENNETH A. BRUNK; RICHARD D.
MORITZ; BRADLEY J. BLACKETOR;
TIMOTHY HADDON; MARTIN M.
HALE, JR.; et al.

Respondents.

**MOTION FOR EXTENSION OF TIME FOR FILING A COMBINED OPENING
BRIEF AND APPENDIX**

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Attorneys for Plaintiff, DANIEL E. WOLFUS

1 Daniel E. Wolfus (hereinafter “Wolfus”) moves for a 30-day extension of
2 time to file his combined opening brief and appendix.

3 Pursuant to NRAP 26(b), Wolfus requests an extension of time from
4 August 20, 2020, to and including September 21, 2020, (30 days) in which to
5 file his combined opening brief and appendix.
6

7 Appellant requests this short extension due to the complex nature of the
8 issues presented, coupled with the unique challenges of conducting business
9 during the Covid-19 pandemic.
10

11 This request is not an attempt to delay or prolong the appellate
12 proceedings and will not cause undue delay. Therefore, the combined
13 opening brief and appendix would be due on or before September 21, 2020.
14 As such, Petitioners’ respectfully request that their motion be granted.
15

16 Dated this 19th day of August 2020.
17

18 /s/ James R. Christensen
19 JAMES R CHRISTENSEN, ESQ.
20 Nevada Bar No. 003861
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24 jim@jchristensenlaw.com
25 *Attorney for Simon*
26
27
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CERTIFICATE OF COMPLIANCE

1
2 I hereby certify that this MOTION FOR EXTENSION OF TIME FOR
3 FILING OF COMBINED OPENING BRIEF AND APPENDIX complies with the
4 formatting requirements of NRAP 32(a)(4), the typeface requirements of
5 NRAP 32(a)(5) and the type style requirements of NRAP 32(a)(6) because this
6 brief has been prepared in a proportionally spaced typeface using Microsoft
7 Office 365 Pro Plus in 14 point Arial font. I further certify that this motion
8
9 complies with the page or type volume limitation of NRAP 32(a)(7) because,
10 excluding the parties of the brief exempted by NRAP 32(a)(7)(C) it does not
11 exceed 30 pages.
12
13

14 I hereby certify that I have read this MOTION FOR EXTENSION OF
15 TIME FOR FILING OF COMBINED OPENING BRIEF AND APPENDIX, and
16 to the best of my knowledge, information, and belief, it is not frivolous or
17 interposed for any improper purpose. I further certify that this MOTION FOR
18 EXTENSION OF TIME FOR FILING OF COMBINED OPENING BRIEF AND
19 APPENDIX complies with all applicable Nevada Rules of Appellate
20 Procedure, in particular NRAP 28(e)(1), which requires every assertion in the
21 brief regarding matters in the record be supported by a reference to the page
22 of the transcript or appendix where the matter relied on is to be found.
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1 I understand that I may be subject to sanctions in the event that it is not
2 in conformity with the Nevada Rules of Appellate Procedures.

3 Dated this 19th day of August 2020.

4
5 */s/ James R. Christensen*
6 JAMES R. CHRISTENSEN ESQ.
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19 Attorneys for Plaintiff DANIEL E. WOLFUS

20 **CERTIFICATE OF SERVICE**

21 I HEREBY CERTIFY that on the 19th day of August 2020, I served a
22 copy of the foregoing MOTION FOR EXTENSION OF TIME FOR FILING OF
23 COMBINED OPENING BRIEF AND APPENDIX electronically to all
24 registered parties.

25 */s/ Dawn Christensen*
26 an employee of JAMES R. CHRISTENSEN
27
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