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Electronically Filed
Sep 09 2014 08:47 a.m.
Tracie K. Lindeman
Clerk of Supreme Court

IN THE SUPREME COURT OF THE STATE OF NEVADA

**Nevada Supreme Court
Case No. 65205**

REZA ZANDIAN A/K/A GOLAMREZA
ZANDIANJAZI A/K/A GHOLAM REZA
ZANDIAN A/K/A REZA JAZI A/K/A J.
REZA JAZI A/K/A G. REZA JAZI A/K/A
GHONOREZA ZANDIAN JAZI, AN
INDIVIDUAL,

Appellant,

vs.

JED MARGOLIN, AN INDIVIDUAL,

Respondent.

MOTION FOR EXTENSION OF TIME TO FILE
OPENING BRIEF AND APPENDIX
(First Request)

COMES NOW, Appellant, REZA ZANDIAN, by and through his
counsel, KAEMPFER CROWELL and Jason Woodbury, and hereby moves
this Honorable Court for an order extending the time for Appellant to file
the *Appendix* and *Opening Brief* in this matter. This *Motion* is made

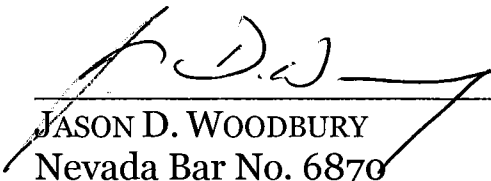
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KAEMPFER CROWELL RENSHAW
GRONAUER & FIORENTINO
510 W. Fourth Street
Carson City, Nevada 89703

1 pursuant to NRAP 26(b)(1)(A) and is based on the attached memorandum
2 of points and authorities and all papers and pleadings on file in this matter.

3 DATED this 8th day of September, 2014.

4 KAEMPFER CROWELL

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7 _____

8 JASON D. WOODBURY
9 Nevada Bar No. 6870
10 510 West Fourth Street
11 Carson City, Nevada 89701
12 Telephone: (775) 884-8300
13 e-mail: jwoodbury@kcnvlaw.com
14 **Attorneys for Appellant,**
15 **REZA ZANDIAN**

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22 KAEMPFER CROWELL RENSHAW
23 GRONAUER & FIORENTINO
24 510 W. Fourth Street
Carson City, Nevada 89703

1 MEMORANDUM OF POINTS AND AUTHORITIES

2 NRAP 26(b)(1)(A) provides, in pertinent part:

3 For good cause, the court may extend the time prescribed by these
4 Rules or by its order to perform any act, or may permit an act to be
5 done after that time expires.

6 On June 4, 2014, this Court discharged this case from the settlement
7 program under NRAP 16 and reinstated briefing.¹ The *Opening Brief* and
8 *Appendix* are presently due to be filed on September 9, 2014.² This *Motion*
9 is Appellant’s first motion to the Court for an extension of time in this
10 matter.

11 There is good cause for the requested extension. The attorney
12 assigned to this matter works in the Carson City office of KAEMPFER
13 CROWELL along with a litigation assistant.³ During the week of September
14 2-5, 2014, the assigned attorney’s assistant was notified of a family
15 emergency.⁴ The family emergency required her to travel out of state where
16 she currently is and is expected to remain for the duration of the week of
17 September 8-12, 2014.⁵ Another litigation assistant, normally available to
18 cover unexpected absences in the Carson City office is also out of the office
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¹ See *Order Reinstating Briefing* (June 4, 2014) (*Zandian v. Margolin*, Case Number 65205).

22 ² See *Order Granting Telephonic Extension* (Aug. 28, 2014) (*Zandian v. Margolin*, Case Number 65205).

23 ³ See *Declaration of Jason Woodbury in Support of Motion for Extension of Time to File Opening Brief and Appendix (First Request)* at ¶¶1, 6 (Sept. 8, 2014) (attached hereto, marked as Exhibit 1 and expressly incorporated herein by reference) [hereinafter “*Woodbury Declaration*”].

24 ⁴ See *Woodbury Declaration* at ¶¶7-8.

⁵ See *Woodbury Declaration* at ¶9.

1 and not scheduled to return until after September 12, 2014.⁶ The assistance
2 of at least one of the individuals who are currently away from the office is
3 important in the preparation of the *Opening Brief* and *Appendix* in this
4 matter.

5 Based on these circumstances, it is respectfully submitted that there
6 is good cause for this Court to grant the extension requested pursuant to
7 NRAP 26(b)(1)(A). At this time, it is not certain when the Carson City office
8 will return to full staff. Therefore, it is respectfully requested that this
9 Court extend the time for the filing of the *Opening Brief* and *Appendix* 30
10 days to ensure that there will be adequate time for their preparation.
11

12 DATED this 8th day of September, 2014.

13 KAEMPFER CROWELL

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15
16 
17 JASON D. WOODBURY
18 Nevada Bar No. 6870
19 510 West Fourth Street
20 Carson City, Nevada 89701
21 Telephone: (775) 884-8300
22 e-mail: jwoodbury@kcnvlaw.com
23 **Attorneys for Appellant,**
24 **REZA ZANDIAN**

24 ⁶ See Woodbury Declaration at ¶10.

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRAP 25(d), I hereby certify that service of the foregoing
3 **MOTION FOR EXTENSION OF TIME TO FILE OPENING BRIEF**
4 **AND APPENDIX (First Request)** was made this date by depositing a
5 true copy of the same for mailing at Carson City, Nevada, first class postage
6 pre-paid, addressed to each of the following:
7

8 Matthew D. Francis
9 Adam P. McMillen
10 WATSON ROUNDS
11 5371 Kietzke Lane
12 Reno, NV 89511

13 DATED this 8th day of September, 2014.

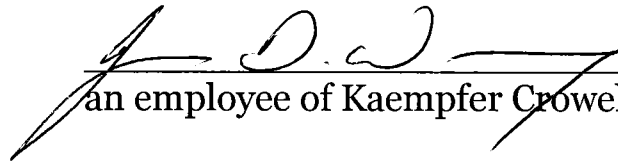
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15 _____
16 an employee of Kaempfer Crowell
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EXHIBIT 1

EXHIBIT 1

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Respondent.

**Nevada Supreme Court
Case No. 65205**

**DECLARATION OF JASON WOODBURY IN SUPPORT OF
MOTION FOR EXTENSION OF TIME TO FILE OPENING BRIEF
AND APPENDIX (FIRST REQUEST)**

I, JASON WOODBURY, under the penalty of perjury, depose and say:

1. I am an attorney duly licensed to practice law in the State of Nevada and a partner with the law firm of KAEMPFER CROWELL which represents REZA ZANDIAN, Appellant in this matter.
2. I have personal knowledge and would competently testify as to the matters set forth herein.

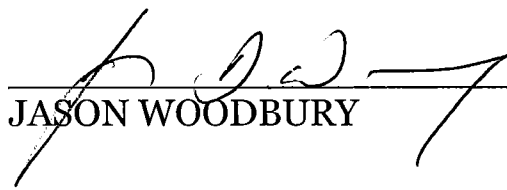
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3. I make this *Declaration in Support of Motion for Extension of Time to File Opening Brief and Appendix (First Request)* in the above-captioned action.
4. I have reviewed the *Motion for Extension of Time to File Opening Brief and Appendix (First Request)* (“*Motion*”) with which this *Declaration* is associated.
5. To the best of my knowledge, information and belief, each factual representation offered in the *Motion* is true.
6. I work in the Carson City office of KAEMPFER CROWELL.
7. KAEMPFER CROWELL employs a litigation assistant who helps me prepare pleadings, including the *Opening Brief* and *Appendix* which will be filed in this matter.
8. During the week of September 2-5, 2014, my assistant was notified of a family emergency.
9. The family emergency required her to travel out of state where she currently is and is expected to remain for the duration of the week of September 8-12, 2014.
10. Another litigation assistant, normally available to cover unexpected absences in the Carson City office is also out of the office and not scheduled to return until after September 12, 2014.

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11. Based upon these circumstances, I believe there is good cause to allow the extension requested in the *Motion for Extension of Time to File Opening Brief and Appendix (First Request)*.

Executed on this 8th day of September, 2014.



JASON WOODBURY