

# WILLICK LAW GROUP

A DOMESTIC RELATIONS & FAMILY LAW FIRM  
3591 EAST BONANZA ROAD, SUITE 200  
LAS VEGAS, NV 89110-2101  
PHONE (702) 438-4100 • FAX (702) 438-5311  
WWW.WILLICKLAWGROUP.COM

## ATTORNEYS

MARSHAL S. WILICK \* † ‡ ®  
TREVOR M. CREEL

\* ALSO ADMITTED IN CALIFORNIA (INACTIVE)  
† FELLOW, AMERICAN ACADEMY OF MATRIMONIAL LAWYERS  
‡ FELLOW, INTERNATIONAL ACADEMY OF FAMILY LAWYERS  
‡ NEVADA BOARD CERTIFIED FAMILY LAW SPECIALIST  
® BOARD CERTIFIED FAMILY LAW TRIAL ADVOCATE  
BY THE NATIONAL BOARD OF TRIAL ADVOCACY



## LEGAL ASSISTANTS

DEISY MARTINEZ-VIERA  
MARY STEELE  
BRENDA GRAGEOLA  
JUSTIN K. JOHNSON  
VICTORIA JAVIEL  
KRISTINA M. MARCUS  
STEPHANIE PITTS

## FIRM ADMINISTRATOR

FAITH FISH

## E-MAIL ADDRESSES:

[FIRST NAME OF INTENDED RECIPIENT]@WILLICKLAWGROUP.COM

January 12, 2024

Hon. Scott S. Harris  
Clerk of the Court  
Supreme Court of the United States  
1 First Street, NE  
Washington, DC 20543

**Re:** Request for extension of time to file response to petition  
*Erich M. Martin v. Raina L. Martin*  
S. Ct. No. 23-605

Dear Mr. Harris:

I am counsel for the respondent in this case. Petitioner filed his petition for writ of certiorari on or about November 30, 2023. Respondent filed her waiver of right to respond on December 14, 2023. On December 26, 2023, the Court issued a request for response with a due date of January 25, 2024. Pursuant to Rule 30.4, respondent respectfully requests that the time for filing a response be extended by 30 days, to and including February 26, 2024.<sup>1</sup>

This is respondent's first request for an extension of time to file the response. Good cause exists for the requested extension. Though I did represent respondent in the district court, the Nevada Court of Appeals, and the Nevada Supreme Court, the issues argued in the Petition will require further legal research. Additionally, respondent was not prepared for the expense required by this response and has been placed in a situation financially that we are in the process of resolving. Lastly, I am the principal in a small firm with over 120 current clients, some of which have appellate documents

<sup>1</sup> The 30 day point falls on a Saturday, and as such we request that the time be extended until the following Monday.

Hon. Scott S. Harris  
January 12, 2024  
Page 2

due to the Nevada Supreme Court that require my direct attention. This extension of time would better enable preparation of a response that would be helpful to the Court.

Accordingly, respondent respectfully requests the time for filing the response to the petition for writ of certiorari be extended by 30 days, to and including February 26, 2024.

Sincerely,  
*/s/ Marshal S. Willick*  
Attorney of Record for  
Raina L. Martin

cc: Carson J. Tucker  
Counsel of Record for Petitioner  
LEX FORI, PLLC  
[cjtucker@lexfori.org](mailto:cjtucker@lexfori.org)