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Attorney for Appellant
Liborius Ihechere Agwara

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

In re:

LIBORIUS IHECHERE AGWARA,
dba AGWARA & ASSOCIATES

Debtor(s).

) Bankruptcy Case No.: BK-S-13-17576-BTB
) Chapter 7

LIBORIUS IHECHERE AGWARA,

Appellant,

v.

KELECHI AGWARA, an individual;
VICTORIA L. NELSON, Chapter 7
Trustee in the Bankruptcy Case of
Liborius Ihechere Agwara,

Appellees.

) U.S. District Court Case No:
) 15-cv-01544-RCJ
) Appeal Reference No.: 15-30

MOTION FOR ENLARGEMENT OF TIME TO FILE
APPELLANT'S REPLY BRIEF

Comes now Appellant, Liborius I. Agwara, by and through his co-counsel GEORGE R. CARTER, ESQ., and moves this Court for an enlargement of the time to file and serve Appellant's Reply Brief in this case from December 9, 2015 to Friday December 18, 2015.

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2 This motion is made and based upon Federal Rule of Bankruptcy Procedure 9006(b)(1)
3 and the attached Declaration of Counsel, and is made in good faith and not to delay justice

4 Done and dated this 8th day of December, 2015.

5 
6 GEORGE R. CARTER, ESQ.
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11 (702) 384-8951
12 Attorney for Appellant
13 Liborius Ihechere Agwara

14 POINTS AND AUTHORITIES

15 **Fed. Rule of BK Procedure 9006(b)(1) states:**

16 (b) *Enlargement.*

17 (1) *In General.* Except as provided in paragraphs (2) and (3) of this
18 subdivision, when an act is required or allowed to be done at or within a specified
19 period by these rules or by a notice given thereunder or by order of court, the court
20 for cause shown may at any time in its discretion (1) with or without motion or notice
21 order the period enlarged if the request therefor is made before the expiration of the
22 period originally prescribed or as extended by a previous order or (2) on motion made
23 after the expiration of the specified period permit the act to be done where the failure
24 to act was the result of excusable neglect.

25 The attached Declaration of Counsel attests that Debtor Liborius I. Agwara presently
26 has three appeals in various stages of preparation, and GEORGE R. CARTER, ESQ., is counsel
27 on all of them.

28 In case BAP No. NV-15-1221, the matter is awaiting setting for oral argument.

In case (APG case Appeal Reference 15-33), Appellant's Opening Brief is complete
and has been filed.

This leaves the instant case- Appeal Reference 15-30 for which the Answering Brief
was filed on November 25, 2015.

Additionally, counsel is preparing for conference on December 22, 2015 with regard
to two adversary proceedings against Debtor.

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Counsel for Debtor is overwhelmed with all the deadlines close together, and therefore files this first request for an enlargement of time to file Appellant's Reply Brief for nine additional days.

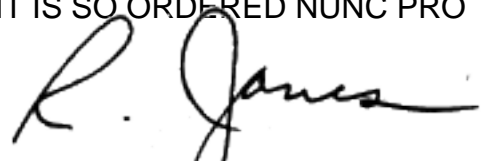
Appellees will not be prejudiced by an additional nine days to file the reply brief, and the additional time will allow proper preparation and serve the interest of justice.

Wherefore, Appellant requests enlargement of time until close of business on December 18, 2015 to file and serve Appellant's Reply Brief.

Done and dated this 8th day of December, 2015.


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Attorney for Appellant
Liborius Ihechere Agwara

IT IS SO ORDERED NUNC PRO TUNC: DATED: December 21, 2015.


ROBERT C. JONES

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DECLARATION OF COUNSEL

STATE OF NEVADA)
)
COUNTY OF CLARK)

GEORGE R. CARTER, under penalty of perjury, states and declares as follows:

1. That he is co-counsel with the Debtor Liborius I. Agwara on this appeal;
2. That Declarant is finishing the pleadings and discovery due in two adversary proceedings against the Debtor;
3. That Declarant is also working on discovery in a related case involving the Debtor;
4. That Declarant requests an enlargement of time to file Debtor's reply brief in this case until Friday, December 18, 2015 to allow proper preparation in all proceedings now underway;
5. That the interest of justice will be served by granting Appellant's request for an enlargement of time.

Done and dated this 8th day of December, 2015.

George R. Carter
GEORGE R. CARTER
Declarant