

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

IN THE SUPREME COURT OF THE STATE OF NEVADA

GARY LAMAR CHAMBERS

Appellant,

vs.

THE STATE OF NEVADA,

Respondent.

S.Ct. No. 73446

D.C. No. C292987-1

Electronically Filed
Sep 06 2017 09:33 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

MOTION FOR ENLARGEMENT OF TIME

COMES NOW Appellant, GARY LAMAR CHAMBERS, by and through his counsel in this matter, JEAN J. SCHWARTZER, ESQ., and moves this Court for the first time for an enlargement of time of eleven (11) days from August 25, 2017 to file Appellant's Request for Transcript making said Request due September 5, 2017. This motion is based upon the following memorandum and all papers and pleadings on file herein.

Dated this 5th day of September, 2017.

Respectfully submitted,

/s/ Jean J. Schwartzer

JEAN J. SCHWARTZER, ESQ.

Law Office of Jean J. Schwartzer

10620 Southern Highlands Parkway

Suite 110- 473

Las Vegas, NV 89141

Phone: 702-979-9941

Fax: 702-447-5044

jean.schwartzter@gmail.com

Counsel for Appellant

1 I, JEAN J. SCHWARTZER, ESQ., am the attorney in the above-captioned case.
2 Pursuant to NRAP 31(b)(3), this Court may grant a first or initial motion for extension
3 of time for filing a request for a transcript upon a clear showing of good cause. This is
4 Appellant's first request for an extension of time.

5 With respect to good cause, the Order to File Request for Transcript filed on
6 August 15, 2017 stated that the Request for Transcript was due August 25, 2017.
7 Counsel mistakenly believed that this due date referred to the date the Request was to
8 be filed in *District Court*. Appellant filed five Requests for Transcript with the District
9 Court in the evening on August 25, 2017. The documents did not receive a file stamp
10 until the following Monday, August 27, 2017. On August 31, 2017, Appellant filed the
11 District Court filed stamped Requests for Transcript with this Court. However, they
12 were rejected for being untimely. Therefore, counsel needs an additional eleven (11)
13 days to file the Requests for Transcript in the instant case. The Requests for Transcript
14 will be filed contemporaneously with the instant Motion. The Court Recorder in this
15 case has been served with the Requests for Transcripts

16 Appellant moves for an enlargement of time of eleven (11) days within which to
17 file Appellant's Requests for Transcript up to and including September 5, 2017.

18 This Motion is made in good faith and not for the purposes of undue delay.

19 I declare under penalty of perjury the factual representations set forth in the
20 foregoing memorandum are true and correct.

21 Dated this 5th day of September, 2017.

22 Respectfully submitted,

23 /s/ Jean J. Schwartzer

24 JEAN J. SCHWARTZER, ESQ.

25 Law Office of Jean J. Schwartzer

26 10620 Southern Highlands Parkway

27 Suite 110- 473

28 Las Vegas, NV 89141

Phone: 702-979-9941

jean.schwartzter@gmail.com

Counsel for Appellant

1
2 **CERTIFICATE OF SERVICE**

3 I certify that on September 5th, 2017, an electronic copy of the foregoing
4 MOTION FOR ENLARGEMENT OF TIME was sent via the master transmission list
5 with the Nevada Supreme Court to the following:

6
7 ADAM LAXALT, ESQ.
Nevada Attorney General

8 STEVEN S. OWENS, ESQ.
9 Chief Deputy District Attorney

10
11 /s/ Jean J. Schwartzer
12 JEAN J. SCHWARTZER, ESQ.
13 Law Office of Jean J. Schwartzer
10620 Southern Highlands Parkway
Suite 110- 473
Las Vegas, NV 89141
14 (702) 979-9941
jean.schwartzter@gmail.com
15 Counsel for Appellant
16
17
18
19
20
21
22
23
24
25
26
27
28