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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
Dec 27 2017 11:48 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

MOTION FOR ENLARGEMENT OF TIME TO FILE
OPENING BRIEF
(FIRST REQUEST)

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 ninety (90) days from December 26, 2017 to file Appellant's Opening Brief making said Request due March 26, 2018. This motion is based upon the following memorandum and all papers and pleadings on file herein.

Dated this 26th day of December, 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 an Opening Brief upon a clear showing of good cause. This is
4 Appellant's first request for an extension of time to file his Opening Brief.

5 With respect to good cause, counsel was extremely ill during the months of
6 September, October and November and had surgery in late November. Counsel has to
7 have one more surgery, which has been delayed due to the holidays. Moreover, the trial
8 transcripts in this case were not even produced until October 30, 2017 due to the court
9 reporter's workload and need to outsource the production of transcripts. Therefore,
10 counsel needs an additional ninety (90) days to file the Appellant's Opening Brief.

11 Appellant moves for an enlargement of time of ninety (90) days within which to
12 file Appellant's Requests for Transcript up to and including March 26, 2018.

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

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

16 Dated this 26th day of December, 2017.

17 Respectfully submitted,

18 /s/ Jean J. Schwartzer

19 JEAN J. SCHWARTZER, ESQ.

20 Law Office of Jean J. Schwartzer

21 10620 Southern Highlands Parkway

22 Suite 110- 473

23 Las Vegas, NV 89141

24 Phone: 702-979-9941

25 jean.schwartzter@gmail.com

26 Counsel for Appellant
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2 **CERTIFICATE OF SERVICE**

3 I certify that on December 26th, 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
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