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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-J

Electronically Filed
Jul 25 2018 07:48 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

MOTION FOR ENLARGEMENT OF TIME TO FILE
OPENING BRIEF
(FOURTH 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 fourth time for an enlargement of time of ten (10) days from July 24, 2018 to file Appellant's Opening Brief making said Brief due August 3, 2018. This motion is based upon the following memorandum and all papers and pleadings on file herein.

Dated this 24th day of July, 2018.

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
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 fourth motion for extension of time
3 for filing an Opening Brief upon a showing of extreme need or extraordinary
4 circumstances. This is Appellant's fourth request for an extension of time to file his
5 Opening Brief.

6 With respect to extreme need or extraordinary circumstances, counsel for
7 appellant has been traveling within and outside of the United States for the entire month
8 of July and arrived home this evening. While counsel brought her laptop with her so as
9 to finish the instant brief, she unexpectedly did not have a consistent and reliable
10 connection to the internet to be able to do so. Counsel for appellant needs an additional
11 ten (10) days to complete the instant Opening Brief. While counsel is aware that this
12 Court's previous Order granting Appellant's third Motion for Enlargement of Time
13 stated that if counsel cannot file the instant brief by July 24, 2018, she should withdraw,
14 counsel has already put close to one hundred (100) hours into the completion of this
15 brief and is only asking for ten (10) additional days.

16 Therefore, Appellant moves for an enlargement of time of ten (10) days within
17 which to file Appellant's Opening up to and including August 3, 2018.

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 24th day of July, 2018.

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

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2 **CERTIFICATE OF SERVICE**

3 I certify that on July 24th, 2018, an electronic copy of the foregoing MOTION
4 FOR ENLARGEMENT OF TIME was sent via the master transmission list with the
5 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.
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