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Appellant,

VS.

Respondent.

D.C. No. C292987-1

Electronically Filed  
Dec 18 2018 09:32 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

## 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 forty-five (45) days from December 17, 2018 to file Appellant's Reply Brief making said brief due January 31, 2019. This motion is based upon the following memorandum and all papers and pleadings on file herein.

Dated this 17<sup>th</sup> day of December, 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  
 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 brief upon a clear showing of good cause. This is Appellant's first  
4 request for an extension of time to file his Reply Brief.

5 With respect to good cause, the State filed its Answering Brief about a week  
6 before Thanksgiving. Shortly after Thanksgiving, Hanukkah commenced. Appellant's  
7 counsel worked limited hours during this time period due to school not being in session  
8 for her two small children and celebrating the holidays. Taking this and the upcoming  
9 two week winter break into consideration, counsel needs an additional forty-five (45)  
10 days to file the Appellant's Reply Brief.

11 Appellant moves for an enlargement of time of forty-five (45) days within which  
12 to file Appellant's Reply Brief up to and including January 31, 2019.

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 17<sup>th</sup> day of December, 2018.

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

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23 Las Vegas, NV 89141

24 Phone: 702-979-9941

25 jean.schwartzter@gmail.com

26 Counsel for Appellant  
27  
28

1  
2 **CERTIFICATE OF SERVICE**

3 I certify that on December 17<sup>th</sup>, 2018, 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.  
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