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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
Feb 25 2019 03:48 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

MOTION FOR ENLARGEMENT OF TIME TO FILE REPLY

BRIEF

(THIRD 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 six (6) days from February 21, 2019 to file Appellant's Reply Brief making said brief due February 27, 2019. This motion is based upon the following memorandum and all papers and pleadings on file herein.

Dated this 25th day of February, 2019.

Respectfully submitted,

/s/ Jean J. Schwartzer

JEAN J. SCHWARTZER, ESQ.

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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 second motion for extension of time
3 for filing a brief upon a showing of extreme need. This is Appellant's third but very brief
4 request for an extension of time to file his Reply Brief.

5 With respect to extreme need, Appellant's Counsel has been working on this
6 brief diligently and on February 20, 2019, the brief was 80% complete. However, due to
7 early school dismissal because of weather, Counsel was not able to work as much as
8 anticipated. Therefore on February 21, 2019, Counsel drafted a Motion for Enlargement
9 of Time. However, when Counsel attempted to PDF the Motion, her computer crashed
10 and she had to reinstall Adobe Acrobat. Counsel had difficulty doing this and after
11 spending a significant amount of time working on it, ultimately had to abandon the
12 process due to having to prepare for an evidentiary hearing scheduled the following day.

13 Over the weekend Counsel attempted several times to install the program. Not
14 only was the program not installing but the computer then started freezing when counsel
15 attempted to access to her electronic files. Counsel has been working on this issue all
16 day today and was finally able to get Adobe Acrobat installed and access her electronic
17 case files. Counsel needs an additional six (6) days from February 21, 2019 to file the
18 Appellant's Reply Brief. Counsel apologizes for the late filing of the instant Motion but
19 it was impossible to convert the motion into the PDF format required for filing in a
20 timely fashion.

21 Appellant moves for an enlargement of time of six (6) days within which to file
22 Appellant's Reply Brief up to and including February 27, 2019.

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

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

Dated this 27th day of February, 2019.

Respectfully submitted,

/s/ *Jean J. Schwartzer*

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Counsel for Appellant

1
2 **CERTIFICATE OF SERVICE**

3 I certify that on February 25th, 2019, 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 AARON FORD, ESQ.
Nevada Attorney General

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

10
11 /s/ Jean J. Schwartz
12 JEAN J. SCHWARTZER, ESQ.
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