

1 **ALEX GHIBAUDO, ESQ.**

Nevada Bar No. 11869

2 **ALEX B. GHIBAUDO, PC**

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Elizabeth A. Brown
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8 **IN THE SUPREME COURT FOR THE STATE OF NEVADA**

9 HOWARD SHAPIRO, ET AL.:

) CASE NO.: 73943

) DIST. CT. CASE. NO.: A706566

10 Appellant,

)

11 v.

)

12 GLENN WELT, ET AL.,

)

13 Respondents.

)

)

14 **MOTION TO EXTEND TIME TO FILE BRIEF UNDER NRAP 26(b)(1)(B)**

15 COMES NOW, Appellants, Howard Shapiro and Jenna Shapiro, through
16 counsel of record, Alex Ghibaudo, Esq., of the Law Office of Alex B. Ghibaudo,
17 PC, and files this motion to extend time to file the opening brief due February 5th,
18 2018. This motion is based upon the following points and authorities.
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POINTS AND AUTHORITIES

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2 On January 19, 2018, undersigned counsel requested a 14 day telephonic
3 extension to file Appellants’ Opening Brief, which was granted per telephonic
4 request on that same day. On January 22, 2018, undersigned counsel suffered a
5 serious burn to the majority of his right hand in a kitchen accident.
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8 Undersigned Counsel was attempting to put out a grease fire accidentally
9 started in a pot of burning oil by a third party. Undersigned counsel grabbed the
10 pot of burning oil and attempted to place it in the sink from the stove when the pot
11 slipped from his grasp due to the heat of the handle. The burning oil spilled into the
12 sink which had some standing water at the bottom and flared up violently,
13 engulfing Undersigned Counsel’s right hand and flaring up to the ceiling.
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16 Undersigned Counsel was rushed to the Veteran’s Administration Hospital
17 on the night of the 22nd, of January, 2018, where he was considered “level 3”
18 trauma, and rushed to a bed for immediate treatment. The burn to Undersigned
19 Counsel’s right hand where diagnosed as 2nd degree burns on all fingers and the
20 palm of Undersigned Counsel’s right hand. Such burns are of a severity that, if not
21 properly treated and cared for can be life threatening.
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23
24 Undersigned Counsel was rushed to University Medical Center’s Burn Unit
25 in the early hours of the 23rd of January, 2018, for specialized care as the Veteran’s
26 Administration Hospital was not equipped to handle such an emergency.
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28

1 Undersigned Counsel was released latter that morning, given a prescription for
2 narcotic painkillers, and referred to UMC's burn center for further treatment.

3
4 Since then, Undersigned Counsel has been convalescing at home, though he
5 has made appearances in court as necessary, and when able. However, due to the
6 pain associated with the burn, and the location of the burn, Undersigned Counsel
7
8 has spent the last 10 days resting and healing, for the most part. As such, he did not
9 receive the benefit of the extension originally granted per the telephonic request
10 made on the 19th of January.
11

12 That initial request was made necessary by an injury suffered to
13 Undersigned Counsel's back in July of 2017 which caused him to miss many days
14 at work in treatment and in trips to the hospital. Undersigned Counsel is now
15 healed sufficiently to be without painkillers and able to complete the Opening
16 Brief by February 9th, 2018.
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19 Undersigned Counsel endeavored to complete the Opening Brief in the time
20 allowed. However, the treatment schedule, pain associated with the injury, and
21 narcotic painkillers prescribed to manage the pain, made it unfeasible.
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