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Respondent.

D.C. No. C-16-314092-1

Electronically Filed  
Aug 21 2019 12:35 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

COMES NOW Appellant, LUIS ANGEL CASTRO, 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 August 24, 2019 to file Appellant's Opening Brief, making said Brief due November 22, 2019. This motion is based upon the following memorandum and all papers and pleadings on file herein.

Dated this 21<sup>st</sup> day of August, 2019.

Respectfully submitted,

/s/ Jean J. Schwartzer  
JEAN J. SCHWARTZER, ESQ.  
Law Office of Jean J. Schwartzer  
Counsel for Appellant

1 MEMORANDUM

2 I, JEAN J. SCHWARTZER, ESQ., am the attorney in the above-captioned case.  
3 Appellant's Opening Brief is due on August 24, 2019. Pursuant to NRAP 31(b)(3), this  
4 Court may grant a motion for extension of time for filing a Request for Transcripts upon a  
5 showing of good cause. This is Appellant's first request for an extension of time for his  
6 Opening Brief.

7 With respect to good cause, Counsel for Appellant has only been able to work  
8 limited hours over the summer due to her children (4 and 7) being out of school.  
9 Furthermore, Counsel is leaving the country today for a week; has a three week trial  
10 starting in September when she returns; and multiple evidentiary hearings to prepare for  
11 in October. Therefore, Counsel needs an additional ninety (90) days to complete the  
12 Opening Brief in the instant case.

13 This Motion is made in good faith and not for the purposes of undue delay. I declare  
14 under penalty of perjury the factual representations set forth in the foregoing  
15 memorandum are true and correct.

16 Dated this 21<sup>st</sup> day of August, 2019.

17  
18 Respectfully submitted,

19 /s/ Jean J. Schwartzer  
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23 Suite 110- 473  
24 Las Vegas, NV 89141  
25 Phone: 702-979-9941  
26 jean.schwartzter@gmail.com  
27 Counsel for Appellant  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY AND AFFIRM that this document was filed electronically with the Nevada Supreme Court on August 21<sup>st</sup> 2019. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

AARON FORD, ESQ.  
Nevada Attorney General

STEVEN S. OWENS  
Chief Deputy District Attorney

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