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Respondent.

D.C. No. C-16-31409-1

**MOTION FOR ENLARGEMENT OF TIME**  
**(Second Request)**

Dated this 25<sup>th</sup> day of February, 2020.

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 Reply Brief is due on February 25, 2020. Pursuant to NRAP 31(b)(3), this Court  
4 may grant a second motion for extension of time for filing a Reply Brief upon a showing of  
5 extreme need. This is Appellant's second request for an extension of time for his Reply  
6 Brief and he is only requesting seven (7) days. His first request was for only seven (7) days.

7 With respect to extreme need, Counsel for Appellant has had to spend an  
8 unexpected and inordinate amount of time locating and communicating with an elderly  
9 witness for an evidentiary hearing set for February 26, 2020. This is not a work load issue.  
10 This is an issue with respect to an unforeseen witness issue that needed to be dealt with  
11 immediately. Therefore, Counsel needs an additional seven (7) days to complete the Reply  
12 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 25<sup>th</sup> day of February, 2020.

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 February 25<sup>th</sup> 2020. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

AARON FORD, ESQ.  
Nevada Attorney General

ALEXANDER G. CHEN, ESQ.  
Chief Deputy District Attorney

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