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Appellant,

THE STATE OF NEVADA,

Respondent.

S.Ct. No. 73446

D.C. No. C292987-1

MOTION FOR ENLARGEMENT OF TIME TO FILE
PETITION FOR REHEARING
(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 third time for an enlargement of time of seven (7) days from September 16, 2019 to file Appellant's Petition for Rehearing making said Petition due September 23, 2019. This motion is based upon the following memorandum and all papers and pleadings on file herein.

Dated this 16th day of September, 2019.

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
jean.schwartzter@gmail.com
Counsel for Appellant

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2 I, JEAN J. SCHWARTZER, ESQ., am the attorney in the above-captioned case.
3 Pursuant to NRAP 40(a)(1), this Court may grant a second motion for extension of time
4 for filing an Petition for Rehearing. This is Appellant's second request for an extension
5 of time to file his Petition for Rehearing.

6 With respect to the need for the second extension, Counsel received an 18 day
7 telephonic extension due to Counsel leaving town for over a week right after the initial
8 decision was issued in this case and then her children being out of school and out of
9 camp until school started. While the initial extension should have been enough time to
10 complete the Petition, recently Counsel had to unexpectedly deal with an estate planning
11 emergency with her father's estate, which took up a large amount of time. Counsel for
12 Appellant left the country on August 23, 2019 and did not return until August 27, 2019.
13 Prior to leaving, she obtained a second extension of twenty-one (21) days.

14 Although Counsel thought that the second extension would be enough time to
15 complete the Petition, she was not quite able to finish it before she started trial on
16 September 9, 2019 and has been working twelve hour plus days on said trial since it
17 started. Counsel worked diligently over this past weekend to finish the Petition but still
18 needs a small amount of additional time. Trial is not in session this coming Friday and
19 Counsel will be able to finish the Petition then.

20 Therefore, Appellant moves for an enlargement of time of seven (7) days within
21 which to file Appellant's Petition for Rehearing up to and including September 23,
22 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 16th day of September, 2019.

Respectfully submitted,

/s/ Jean J. Schwartz
JEAN J. SCHWARTZER, ESQ.
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CERTIFICATE OF SERVICE

I certify that on September 16, 2019, an electronic copy of the foregoing
MOTION FOR ENLARGEMENT OF TIME was sent via the master transmission list
with the Nevada Supreme Court to the following:

AARON FORD, ESQ.
Nevada Attorney General

STEVEN S. OWENS, ESQ.
Chief Deputy District Attorney

/s/ Jean J. Schwartzer
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