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Appellant,

VS.

Respondent.

S.Ct. No. 80318

D.C. No. C333318

Electronically Filed  
Feb 02 2021 02:42 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

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COMES NOW Appellant, KODY HARLAN, by and through his counsel in this matter, JEAN J. SCHWARTZER, ESQ., and moves this Court for the fourth time for an enlargement of time of fourteen (14) days from February 2, 2021 to file Appellant's Opening Brief, making said brief due February 16, 2021. This motion is based upon the following memorandum and all papers and pleadings on file herein.

Dated this 2<sup>nd</sup> day of February, 2021.

Respectfully submitted,

/s/ Jean J. Schwartzer  
JEAN J. SCHWARTZER, ESQ.  
Law Office of Jean J. Schwartzer, Ltd  
170 S. Green Valley Parkway #300  
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Las Vegas, NV 89141  
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jean.schwartz@ gmail.com  
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 February 2, 2021. Pursuant to NRAP 31(b)(3)(B),  
4 this Court may grant a fourth motion for extension of time for filing an Opening Brief  
5 upon a showing of extreme need. This is Appellant's fourth request for an extension of  
6 time to file his Opening Brief.

7 Subsequent to Counsel's children being home from school from December 19,  
8 2020 to January 3, 2021 for winter break during which time Counsel could not work,  
9 from January 15, 2021 to January 28, 2021 Counsel's two young children (5 and 8  
10 years old) were suddenly and unexpectedly quarantined from school due to exposure  
11 to COVID. During this time period Counsel had to conduct virtual/home schooling for  
12 both children and was only able to work a few hours. Her children returned to school  
13 this past Friday, January 28, 2021 and Counsel is back to work full-time.

14 Therefore, Appellant requests fourteen (14) additional days to file his Opening  
15 Brief making said brief due on February 16, 2021.

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

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

19 Dated this 2<sup>nd</sup> day of February, 2021.

20  
21 Respectfully submitted,

22 /s/ Jean J. Schwartzer  
23 JEAN J. SCHWARTZER, ESQ.  
24 Law Office of Jean J. Schwartzer, Ltd.  
25 170 S. Green Valley Parkway #300  
26 Las Vegas, NV 89141  
27 Phone: 702-979-9941  
28 jean.schwartzter@gmail.com  
Counsel for Appellant

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3                   **CERTIFICATE OF SERVICE**

4           I HEREBY CERTIFY AND AFFIRM that this document was filed  
5 electronically with the Nevada Supreme Court on February 2<sup>nd</sup>, 2021. Electronic  
6 Service of the foregoing document shall be made in accordance with the Master  
7 Service List as follows:

8  
9                   AARON FORD, ESQ.  
Nevada Attorney General

10                  ALEXANDER G. CHEN, ESQ.  
11 Chief Deputy District Attorney

12  
13                   /s/ Jean J. Schwartzer  
14 JEAN J. SCHWARTZER, ESQ.  
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18 Counsel for Appellant  
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