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Respondent.

Electronically Filed  
Mar 12 2021 10:47 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

COMES NOW Appellant, KODY HARLAN, by and through his counsel in this matter, JEAN J. SCHWARTZER, ESQ., and moves this Court for the seventh time for an enlargement of time of five (5) days from March 12, 2021 to file Appellant's Opening Brief, making said brief due March 17, 2021. This motion is based upon the following memorandum and all papers and pleadings on file herein.

Dated this 12<sup>th</sup> day of March, 2021.

Respectfully submitted,

/s/ Jean J. Schwartzer  
JEAN J. SCHWARTZER, ESQ.  
Law Office of Jean J. Schwartzer, Ltd  
170 S. Green Valley Parkway #300  
Suite 110- 473  
Las Vegas, NV 89141  
Phone: 702-979-9941  
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 March 12, 2021. Pursuant to NRAP 31(b)(3)(B),  
4 this Court may grant a seventh motion for extension of time for filing an Opening  
5 Brief upon a showing of extreme need.

6 Counsel had to spend an inordinate amount of time splitting the appendix and  
7 adding the index and cover page multiple times and then reformatting multiple times  
8 to create small enough files that would be accepted by the e-filing system. As a result,  
9 counsel was unable to finish the Opening Brief prior to leaving for San Francisco, CA  
10 for a medical trip on Thursday evening. Although counsel brought the file and her  
11 laptop with her, she spent six hours today undergoing medical testing and was unable  
12 to devote enough time today to finishing the Opening Brief. Counsel has more  
13 medical appointments through Monday March 15<sup>th</sup> and returns home Monday  
14 evening. Counsel apologizes for the delay and is doing the best she can under the  
15 circumstances.

16 Therefore, Appellant requests five (5) additional days to file his Opening Brief  
17 making said brief due on March 17, 2021.

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

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

21 Dated this 12<sup>th</sup> day of March, 2021.

22  
23 Respectfully submitted,

24 /s/ Jean J. Schwartzer  
25 JEAN J. SCHWARTZER, ESQ.  
26 Law Office of Jean J. Schwartzer, Ltd.  
27 170 S. Green Valley Parkway #300  
28 Las Vegas, NV 89141  
Phone: 702-979-9941  
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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 March 12<sup>th</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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