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Respondent.

Electronically Filed
Aug 16 2021 09:19 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 first time for an enlargement of forty-five (45) days from August 16, 2021 to file Appellant's Reply Brief, making said brief due September 30, 2021. This motion is based upon the following memorandum and all papers and pleadings on file herein.

Dated this 16th day of August, 2021.

Respectfully submitted,

/s/ Jean J. Schwartz
JEAN J. SCHWARTZER, ESQ.
Law Office of Jean J. Schwartz
170 S. Green Valley Parkway
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Henderson, NV 89012
Phone: 702-979-9941
jean.schwartzter@gmail.com
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 August 16, 2021. Pursuant to NRAP 31(b)(3)(B),
4 this Court may grant a first motion for extension of time for filing a Reply Brief upon
5 a showing of good cause. This is Appellant's first request for an extension of time to file
6 his Reply Brief.

7 With respect to good cause, the State filed its Answering Brief on July 15, 2021
8 and Counsel's children's summer camp had closed indefinitely two weeks earlier due
9 to a COVID outbreak. Counsel returned to work full time when her children started
10 school to August 9, 2021. Therefore, Appellant requests forty-five (45) additional
11 days to file his Reply Brief.

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

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

15 Dated this 16th day of August, 2021.

16
17 Respectfully submitted,

18 /s/ Jean J. Schwartzer
19 JEAN J. SCHWARTZER, ESQ.
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22 Suite 300
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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 August 16th, 2021. Electronic
6 Service of the foregoing document shall be made in accordance with the Master
7 Service List as follows:

8 AARON FORD, ESQ.
9 Nevada Attorney General

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

12 /s/ Jean J. Schwartz
13 JEAN J. SCHWARTZER, ESQ.
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19 jean.schwartz@gmail.com
20 Counsel for Appellant
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