## IN THE SUPREME COURT OF THE STATE OF NEVADA

SPECIAL ADMINISTRATOR SHALONDA MOLLETTE, AN INDIVIDUAL, IN PLACE AND STEAD OF JOE N. BROWN,

Appellant,

VS.

GNL, CORP., A NEVADA CORPORATION, AND THYSSENKRUPP ELEVATOR CORP., A FOREIGN CORPORATION,

Respondents.

SPECIAL ADMINISTRATOR SHALONDA MOLLETTE, AN INDIVIDUAL, IN PLACE AND STEAD OF JOE N. BROWN,

Appellant,

VS.

GNL, CORP., A NEVADA
CORPORATION, AND
THYSSENKRUPP ELEVATOR
CORP.,
A FOREIGN CORPORATION,
Respondents.

No. 80581

Electronically Filed May 19 2022 11:52 p.m. Elizabeth A. Brown Clerk of Supreme Court

No. 81151

## SIXTH MOTION TO EXTEND TIME TO FILE OPENING BRIEF AND APPENDIX

Pursuant to NRAP 26(b), NRAP 27, and NRAP 31(b)(3), Appellant Special Administrator Shalonda Mollette ("Appellant") respectfully moves this Honorable Court (this "Motion") for an order extending the time to file Appellant's opening brief and appendix to twelve (12) days from the current deadline of May 19, 2022. Appellant respectfully submits that *two (2) of the five (5) prior requests* for extensions were based on Appellant's counsel's health issues, and that the first three

requests were based on the delayed production of transcripts. Appellant and undersigned counsel's diligence are reflected in all of the motions and filings Appellant submitted in relation to the transcripts.

In support of this Motion, Appellant avers as follows:

- 1. Appellant respectfully requests that this Court take judicial notice of its docket, including the procedural history set forth in Appellant's April 18, 2022 motion.
- 2. Appellant filed an original transcript request on February 27, 2020 and, following the District Court's May 26, 2020 order for clarification, a detailed Notice of Clarification on June 3, 2020. Multiple motions followed and, ultimately, the transcripts were produced, per the court recorder's filing of a certificate of delivery on February 2, 2022.
- 3. Undersigned counsel continues to have significant health and personal issues, can submit evidence of the same *in camera*, and respectfully requests this additional delay.
- 4. From the date of availability of the transcripts, February 2, 2022, to the proposed deadline of May 31, 2022, covers approximately 118 days, which is close to the 120 days appellants typically have between docketing of an appeal and the submission of an opening brief. Undersigned counsel submits that, unfortunately, the circumstances here warrant such extension.

WHEREFORE, Appellant respectfully requests that this Court enter an Order granting this Motion.

Dated May 19, 2022.

Respectfully submitted,

IQBAL LAW PLLC

MOHAMED A. IQBAL, JR.

Nevada Bar No. 10623

101 Convention Center Dr., Suite 1175

Las Vegas, NV 89109 Attorneys for Appellant

## **CERTIFICATE OF SERVICE**

I certify that I am an employee of IQBAL LAW PLLC and that on May 19,
2022, I caused a true and correct copy of the SIXTH MOTION TO EXTEND TIME TO
FILE OPENING BRIEF AND APPENDIX to be served as follows:
By placing the same to be deposited for mailing in the United States Mail.
in a sealed envelope upon which first class postage was prepaid in Las Vegas,
Nevada; and/or
Pursuant to NEFCR 9, to be sent via facsimile; and/or
_X_ Pursuant to NEFCR 9, by transmitting via the Court's electronic filing
services by the document(s) listed above to the Counsel set forth on the service
list.
/s/ Gabriel A. Meyer M. An Employee of IOBAL LAW PLLC