

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
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Elizabeth A. Brown
Clerk of Supreme Court

No. 81151

**SEVENTH AND FINAL 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 for ten (10) days from the current deadline of June 3, 2022, to June 13, 2022. Appellant respectfully submits that the first three (3) requests were based on the delayed production of transcripts and not attributable to Appellant or

Appellant's undersigned counsel. Appellant and undersigned counsel's diligence are reflected in all of the motions and filings Appellant submitted in relation to the transcripts, and will be reflected in the substantial record involved in this appeal.

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 and Appellant's May 19, 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 (i) is currently out of the country and struggling with health and personal issues that have made this time period the most difficult stretch in 15 years of practicing law; (ii) previously erred by requesting limited extensions rather than the necessary time periods needed to address those issues and prosecute this appeal; and (iii) can submit evidence of (i) *in camera*, and respectfully requests this final delay.

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4. The appendix for Appellant's opening brief will be filed following the filing of this motion and reflect more than 150 separate pleadings, orders, transcripts, and varied components of a substantial record.

5. From the date of availability of the transcripts, February 2, 2022, to the proposed deadline of June 13, 2022, covers approximately 131 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 *final* extension.

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

Dated June 3, 2022.¹

Respectfully submitted,

IQBAL LAW PLLC



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Attorneys for Appellant

¹ It is June 4, 2022 where undersigned counsel currently is (India), but still June 3, 2022 in Nevada.

CERTIFICATE OF SERVICE

I certify that I am an employee of IQBAL LAW PLLC and that on June 3, 2022, I caused a true and correct copy of the **SEVENTH AND FINAL 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
An Employee of IQBAL LAW PLLC