1	IN THE SUPREME COURT OF THE STATE OF NEVADA
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3	LEONIDAS P. FLANGAS, AN INDIVIDUAL) Case #81385 Appellant,) Case #81385
4	$v_{s.}$ Electronically Filed Aug 09 2020 02:27 p.m.
5	PERFEKT MARKETING LLC., AN
6	ARIZONA LIMITED LIABILITY) COMPANY,)
7	Respondents,
8	MOTION TO ENLARGE TIME TO FILE DOCKETING STATEMENT
9	(Second Request)
10	Appellants, LEONIDAS P. FLANGAS, AN INDIVIDUAL, by and through his attorney, IAN
11	CHRISTOPHERSON, ESQ., hereby moves this Court for an Order enlarging the time within
12 13	which to file the Docketing Statement to thirty (30) days after this Court grants the instant
13	motion.
15	This Motion is brought pursuant to NRAP 26(b)(1)(A) on the grounds that good cause exists
16	to enlarge the time to file the Docketing Statement and is based on this motion, the attached
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18	Memorandum of Points and Authorities and Declaration of Ian Christopherson, Esq., the
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1	papers and pleadings on file and on such other oral or documentary evidence that may be
2	subsequently presented.
3	Dated this _9 day of August, 2020.
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5 6	By: <u>/s/ Ian Christopherson</u>
0 7	IAN CHRISTOPHERSON, Esq.
8	Nevada Bar No.: 3701 Telephone: (702) 372-9649
9	600 S. Third Street Las Vegas, NV 89101
10	Attorneys for Appellant
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12	MEMORANDUM OF POINTS AND AUTHORITIES
13	I.
14	GOOD CAUSE EXISTS TO ENLARGE TIME TO FILE FAST TRACK STATEMENT AND APPENDIX
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16	NRAP 26(b)(1)(A) provides in relevant part:
17	For good cause, the court may extend the time prescribed by these Rules or by its order to perform any act, or may
18	permit an act to be done after that time expires
19	Mr. Christopherson respectfully requests the Court to grant an extension of time to file
20	Docketing Statement. Mr. Christopherson is currently short staffed with the current COVID-19
21	pandemic.
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1	CONCLUSION
2	Due to the foregoing it is respectfully submitted that good cause exists to grant the motion
3	to enlarge the time within which to file Docketing Statement for thirty (30) days from the date
4	this Court approves this motion.
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6	Dated this _9 day of August, 2019.
7	
8	By: <u>/s/ Ian Christopherson</u>
9 10	IAN CHRISTOPHERSON, Esq.
10	Nevada Bar No.: 3701 Telephone: (702) 372-9649
12	600 S. Third Street Las Vegas, NV 89101
13	Attorneys for Appellant
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1	DECLARATION OF IAN CHRISTOPHERSON
1	IAN CHRISTOPHERSON declares as follows:
2	1. I am attorney licensed to practice before all the courts of the State of Nevada. All of
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5	the fact set forth here are true of my own personal knowledge. If called to testify I
6	could, and would, testify as to them.
7	2. I represent the Appellant in the above referenced case.
8	3. I am currently short staffed with the current COVID-19 pandemic.
9	4. This is my Second Request for an extension of time to file the Docketing Statement.
10	I declare under penalty of perjury under the laws of the State of Nevada that the foregoing
11	is true and correct.
12	Executed this 9 th day of August 2020 at Las Vegas, Nevada.
13	/s/ Ian Christopherson
14	IAN CHRISTOPHERSON, Esq.
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1	CERTIFICATE OF SERVICE
2	I hereby certify that on the 9 th day of August 2020 that I served the foregoing MOTION
3	TO ENLARGE TIME TO FILE DOCKETING STATEMENT (Second Request) on all
4	interested parties by placing a true and correct copy thereof in a sealed envelope with first class
5	postage thereon and depositing same in the United States Mail at Las Vegas, Nevada addressed as
6 7	follows:
/ 8	VERNON A. NELSON, JR., ESQ.
9	6787 W. Tropicana Ave, #103 Las Vegas, NV 89103
10	Attorney for Respondents
11	/s/ <u>Natasha Smith</u>
12	An Employee of the Firm
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