

**BIN THE SUPREME COURT OF THE STATE OF NEVADA**

LEONIDAS P. FLANGAS, AN  
INDIVIDUAL,

Appellant,

vs.

PERFEKT MARKETING, LLC, AN  
ARIZONA LIMITED LIABILITY  
COMPANY,

Respondent.

**No. 81385**

Electronically Filed  
Mar 08 2021 10:35 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**MOTION FOR EXTENSION OF TIME FOR OPENING BRIEF AND  
APPENDIX**

**(First Request)**

Appellant hereby moves for a 30-day extension of time for filing the opening brief and the appendix. The brief is presently due for filing on March 9, 2021. Therefore, appellant requests an extension until April 8, 2021.

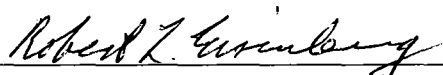
This appeal involves domestication of a foreign judgment. The factual situation and the legal issues (which include constitutional issues) are somewhat unusual. The undersigned counsel associated into the case as appellate counsel after the briefing schedule had already been reinstated. Since that time, counsel had a Nevada Supreme Court oral argument in a complex medical malpractice case, which involved several days of preparation. Counsel also prepared an answering brief in a very unusual and complex appeal involving commercial litigation.

In addition to the foregoing, the undersigned counsel is the attorney coach of a high school mock trial team. Counsel's team participated in the Northern Nevada regional competition (first place) on February 11-12, and the Nevada State competition (second place) on February 25-26. These competitions, including practices leading up to the competitions, were very time consuming. The undersigned counsel also had some medical issues during the last few weeks that caused time away from work.

The undersigned counsel has been working with trial counsel to obtain necessary transcripts, to put the appendix together, and to draft the brief. But appellant's attorneys will be unable to complete the brief by the current deadline.

Accordingly, appellant requests a 30-day extension until April 8, 2021, for the opening brief and the appendix. This request is being made in good faith, without the intent to delay this appeal unnecessarily.

DATED: March 8, 2021

  
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## CERTIFICATE OF SERVICE

I certify that I am an employee of Lemons, Grundy & Eisenberg and that on this date the foregoing document was filed electronically with the Clerk of the Nevada Supreme Court, and therefore electronic service was made in accordance with the master service list as follows:

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DATED: March 8, 2021

  
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Employee of Lemons, Grundy & Eisenberg