

IN 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
Apr 05 2021 10:57 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

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

(Second 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 April 9, 2021. Therefore, appellant requests an extension until May 8, 2021. This is appellant's second request for an extension for the opening brief.

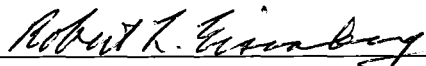
This appeal involves domestication of a foreign judgment. The factual situation and the legal issues (which include constitutional issues) are somewhat unusual. The undersigned counsel associated into the case as appellate counsel after the briefing schedule had already been reinstated.

Appellant is an attorney, and he has been planning to have significant personal involvement with his other attorneys in preparation of the opening brief and the

appendix. This court granted the first extension on March 8, 2021. Only nine days later, on March 17, 2021, appellant's father, Peter L. Flangas, Esq., passed away. Consequently, appellant became unavailable to work on this case and other cases due to matters relating to his father's death, including appellant being the responsible person to make funeral arrangements in Salt Lake City, Utah. Appellant was frequently unreachable during this time frame, and was therefore unable to work with other counsel on the opening brief in this appeal.

Accordingly, Appellant requests a 30-day extension until May 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: April 5, 2021



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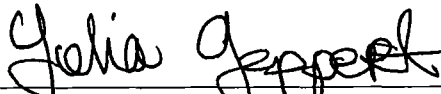
CERTIFICATE OF SERVICE

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: April 5, 2021



Employee of Lemons, Grundy & Eisenberg