

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
Jun 23 2021 09:58 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

**RESPONDENT'S MOTION FOR EXTENSION OF TIME TO
FILE RESPONSIVE BRIEF**

VERNON NELSON, ESQ.

Nevada Bar No. 6434

THE LAW OFFICE OF VERNON NELSON, PLLC

6787 West Tropicana Ave., Suite 103

Las Vegas, NV 89103

Telephone: (702) 476-2500

Attorneys for Appellants

Respondent, Perfekt Marketing, LLC (“Respondent”) hereby requests an extension of time to file the Responsive Brief.

The extension is requested due to difficulties in Respondent’s counsel’s office (“LOVN”). Due to COVID-19, LOVN’s office has experienced significant downsizing. When Respondent first engaged LOVN to represent it in this matter, LOVN employed four attorneys, a paralegal, and three legal assistants. Due to the pandemic LOVN has had to reduce staff and LOVN currently has one lawyer and one legal assistant.

On June 2, 2021, LOVN emailed the Supreme Court clerk to advise that LOVN would be calling for an extension. The email was also intended to be a reminder to LOVN to call the Clerk in the morning. Here is the substance of that email.

From: Vernon Nelson <vnelson@nelsonlawfirmnv.com>
Sent: Wednesday, June 2, 2021 5:17 PM
To: nvscclerk@nvcourts.nv.gov
Cc: Ana Brady <anab@nelsonlawfirmnv.com>
Subject: Flangas v. Perfekt Marketing, Case No. 81385, Extension of Time to File Responsive Brief

Hi All- Hope you are well. We represent Respondent Perfekt Marketing.

I have been working on matters outside of the office over the last several weeks and I’m just getting back to office. I need some time to “catch-up” on this matter and other matters.

I wanted to let you know that we intend to call the Clerk’s Las Vegas Office tomorrow and request an extension of time to file the Response. In the past, the Clerk has granted “fast track” extensions up to 14 days. In this case, a 14 day extension would be great.

Kind regards,

Vernon Nelson
The Law Office of Vernon Nelson

6787 W. Tropicana Ave., Suite 103
Las Vegas, NV 89103
702-476-2500 (Office)
702-525-7884 (Cell)
vnelson@nelsonlawfirmly.com

Unfortunately, Mr. Nelson of LOVN accidentally moved this email into the incorrect folder and he failed to call to obtain the extension to file the Responsive Brief.

When Mr. Nelson realized his mistake, he had to work quickly to draft the Responsive Brief and coordinate the filing of the brief with LOVN's Legal Assistant, Ana Brady. Unfortunately, Ms. Brady's mother slipped and fell and broke her hip and her femur and had to go the emergency room and have emergency surgery. Thus, Ms. Brady was not available to help with the formatting, finalizing, and filing the Responsive Brief.

Ms. Brady was able to work on the Responsive Brief yesterday and she anticipate she will be able to finish it shortly. While she anticipates she will be able to finish it by June 24, 2021, it is possible she may be called away to attend to her mother.

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Accordingly, Respondent respectfully requests an extension of time to file the Responsive Brief by June 28, 2021. This is Respondent's first request for an extension of time.

DATED: June 23, 2021.

THE LAW OFFICE OF VERNON NELSON, PLLC

By: /s/ Vernon Nelson

VERNON NELSON

Nevada Bar No. 6434

6787 W. Tropicana Ave., Suite 103

Las Vegas, NV 89103

Attorneys for Appellants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of The Law Office of Vernon Nelson, and that on the 23rd day of June, 2021, I caused to be served a true and correct copy of the foregoing **RESPONDENT'S MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE BRIEF**, in the following manner:

Electronic Service of the document shall be made in accordance with the Master Service List as follows:

IAN CHRISTOPHERSON, ESQ.
(SBN3701)
600 South Third Street
Las Vegas, Nevada 89101
Telephone (702) 372-9649
iclaw44@gmail.com

ROBERT L. EISENBERG, ESQ.
(SBN 950)
LEMONS, GRUNDY&EISENBERG
6005 Plumas St., Third Floor
Reno, Nevada 89519
Telephone (775) 786-6868
rle@lge.net

ATTORNEYS FOR APPELLANT

/s/ Vernon Nelson

An Employee of The Law Office of Vernon Nelson

DECLARATION OF VERNON NELSON, ESQ.

I, Vernon Nelson, declare as follows:

1. I am an attorney licensed to practice law in the State of Nevada, and the Managing Member of the Law Office of Vernon Nelson (“LOVN”), counsel for Respondent, on whose behalf I make this declaration. I am responsible for handling this matter. If called as a witness I would competently testify to the matters set forth herein of my own personal knowledge.

2. Respondent, Perfekt Marketing, LLC (“Respondent”) hereby requests an extension of time to file the Responsive Brief. The extension is requested due to difficulties in Respondent’s counsel’s office (“LOVN”). Due to COVID-19, LOVN’s office has experienced significant downsizing. When Respondent first engaged LOVN to represent it in this matter, LOVN employed four attorneys, a paralegal, and three legal assistants. Due to the pandemic LOVN has had to reduce staff and LOVN currently has one lawyer and one legal assistant.

3. On June 2, 2021, I emailed the Supreme Court clerk to advise that LOVN would be calling for an extension. The email was also intended to be a reminder to myself to call the Clerk in the morning. A true copy of that email follows:

From: Vernon Nelson <vnelson@nelsonlawfirmnv.com>

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To: nvscclerk@nvcourts.nv.gov

Cc: Ana Brady <anab@nelsonlawfirmnv.com>

Subject: Flangas v. Perfekt Marketing, Case No. 81385, Extension of Time to File Responsive Brief

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Kind regards,

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vnelson@nelsonlawfirmnv.com

Unfortunately, I accidentally moved this email into the incorrect folder and I failed to call to obtain the extension to file the Responsive Brief.

4. When I realized my mistake, I worked quickly to draft the Responsive Brief and coordinate the filing of the brief with LOVN's Legal Assistant, Ana Brady. Unfortunately, Ms. Brady's mother slipped and fell and broke her hip and her femur and had to go to the emergency room and have emergency surgery. Thus, Ms. Brady was not available to help with the formatting, finalizing, and filing the Responsive Brief.

5. Ms. Brady was able to work on the Responsive Brief yesterday and she anticipates she will be able to finish it shortly. While she anticipates she will be able to finish it by June 24, 2021, it is possible she may be called away to attend to her mother.

6. Accordingly, Respondent respectfully requests an extension of time to file the Responsive Brief by June 28, 2021. This is Respondent's first request for an extension of time.

I swear under the penalty of perjury that the foregoing is true and correct.

June 23, 2021

/s/ Vernon Nelson
Vernon Nelson