

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

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Jun 29 2021 04:23 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

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

VERNON NELSON, ESQ.

Nevada Bar No. 6434

THE LAW OFFICE OF VERNON NELSON, PLLC

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Attorneys for Appellants

Respondent, Perfekt Marketing, LLC (“Respondent”) hereby requests a second extension of time to file the Responsive Brief. In its initial request for extension of time, Respondent stated an extension was required because LOVN’s Legal Assistant, Ana Brady was not available to help prepare the Responding Brief because her 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 finalizing the Responsive Brief. Respondent further stated Ms. Brady was able to work on the Responsive Brief and she anticipated LOVN would be prepared to file the brief by June 24, 2021. However, Respondent stated it was possible she may be called away to attend to her mother. In fact, Ms. Brady did have to attend to her mother who was in intensive care. However, LOVN is prepared to file the Responding Brief now and will do so concurrently with this Second Request. 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 29, 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 29th day of June, 2021, I caused to be served a true and correct copy of the foregoing **RESPONDENT'S SECOND 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:

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ATTORNEYS FOR APPELLANT

/s/ Ana Brady

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. In its initial request for extension of time, Respondent stated an extension was required because LOVN’s Legal Assistant, Ana Brady was not available to help prepare the Responding Brief because her 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.

3. Respondent stated Ms. Brady was able to work on the Responsive Brief and LOVN expected the brief to be filed by June 24, 2021. However, Respondent stated it was possible she may be called away to attend to her mother.

4. In fact, Ms. Brady did have to attend to her mother who was in intensive care. However, LOVN is prepared to file the Responding Brief now and will do so concurrently with this Second Request.

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

June 29, 2021

/s/ Vernon Nelson
Vernon Nelson