

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

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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 reply brief. The reply brief is presently due for filing on July 29, 2021. Therefore, appellant requests an extension until August 30, 2021.

This appeal involves domestication of a foreign judgment. The factual situation and the legal issues (which include constitutional issues) are somewhat unusual.

Additionally, appellant's counsel Robert Eisenberg has had a medical problem for a few months. He had an MRI on July 27, and an outpatient surgical procedure yesterday, July 28. He is optimistic for a speedy recovery, but he is unsure of the extent to which this will interfere with work.

Further, Eisenberg has a longstanding eight-day personal trip planned during the first week of August. This is a family trip that was planned months ago. All aspects of the trip have already been arranged and paid. When Eisenberg's surgical procedure got scheduled for just a few days before the trip, he decided not to cancel the trip for his family. Instead, he plans to go on the trip and try to make the best of it during his recovery.

Accordingly, appellant requests an additional 30 days for the reply brief. This will result in a due date of August 30, 2021, for the reply brief.

The undersigned counsel has been working with trial counsel to draft the reply brief. But Appellant's attorneys will be unable to complete the brief by the current deadline.

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

DATED: July 29, 2021

/s/Ian Christopherson
ROBERT L. EISENBERG (Bar No. 0950)
Lemons, Grundy & Eisenberg
IAN CHRISTOPHERSON (Bar No. 3701)
ATTORNEYS FOR APPELLANT

CERTIFICATE OF SERVICE

I certify that I am an employee of the firm, 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:

Vernon Nelson
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Attorneys for Respondent

DATED: July 29, 2021

/s/Natasha Smith
Employee of the firm