

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
Aug 30 2021 01:33 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

MOTION FOR EXTENSION OF TIME FOR REPLY BRIEF

(Second Request)

Appellant hereby moves for a 10-day extension of time for filing the reply brief. The brief is presently due for filing on August 30, 2021. Therefore, appellant requests an extension until September 9, 2021. This is appellant's second request for an extension for the reply brief.¹

As indicated in appellant's first motion for an extension for the reply brief, appellant's counsel, Robert Eisenberg, had outpatient surgery on July 28, 2021, followed by a family vacation that had been planned for months. The vacation was

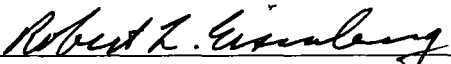
¹ Appellant's first motion for an extension for the reply brief (filed on July 29, 2021) was incorrectly titled as a motion for extension for the opening brief. The body of the motion, however, correctly referred to the reply brief. This court granted the extension for the reply brief in an order entered on August 2, 2021.

the first week of August 2021. Upon returning from vacation, Eisenberg became ill, resulting in a loss of time for his ability to work on the reply brief during the second week of August. After recovering, he needed to attend a time-consuming trial in Las Vegas, which finished on Tuesday, August 24, 2021.

Eisenberg has been working diligently on the reply brief, and he is nearly finished with it. But it still needs some finalization of the content, and it will need to be cite-checked, proofread, formatted, and reviewed further by Eisenberg's client and other counsel working with Eisenberg on the brief. This will take a few more days. Therefore, appellant respectfully requests an extension of 10 additional days, until September 9, 2021, for the reply brief.

This request is being made in good faith, without the intent to delay this appeal unnecessarily.

DATED: Aug. 30, 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 this 30th day of August, 2021.



EMPLOYEE OF LEMONS, GRUNDY & EISENBERG