1	IN THE SUPREME COURT OF THE STATE OF NEVADA
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3	RONALD DAVID HARRIS,) Electronically Filed
4) Feb 11 2021 09:41 a.m.
5	Appellant,) Elizabeth A. Brown) Case NG ler b of Supreme Court
6	vs.
7 8	JENNIFER FIGUEROA,
o 9	Respondent.
10)
11	APPELLANT'S MOTION FOR EXTENTION OF TIME
12	COMES NOW Appellant, RONALD DAVID HARRIS, by and through his attorney,
13	LANCE J. HENDRON, and moves for an extension of time of ninety (90) days from Monday,
14	December 7, 2020 through and including Sunday, March 7, 2021.
15	DATED this <u>11th</u> day of February, 2021.
16 17	
17 18	Respectfully Submitted,
10	HENDRON LAW GROUP, LLC
20	/s/ L. Hendron
21	Lance J. Hendron, Esq. Nevada Bar No. 11151
22	625 S. Eighth Street Las Vegas, NV 89101
23	Office: (702) 710-5555 Facsimile: (702)718-5555
24	Email: <u>lance@hlg.vegas</u>
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	¹ Docket 81746 Document 2021-04110

1		DECLARATION OF LANCE J. HENDRON
2	1.	I am an attorney licensed to practice law in the State of Nevada; I have chosen to handle
3		the appeal of this matter pro bono; I am familiar with the procedural history of this case.
4 5	2.	Appellant, Ronald David Harris, provided his Notice of Appeal in this matter. His Notice
6		of Appeal was electronically filed by this Honorable Court on September 8, 2020.
7	3.	Under Nevada Rule of Appellate Procedure 31(a)(2)(A), Appellant's Opening Brief
8		deadline was December 7, 2020.
9	4.	On November 5 [,] 2020, Declarant was notified by the Legal Aid of Sothern Nevada
10 11		("LASN") regarding Appellant's case. I notified LASN on the same day that I would
11		accept Appellant's case pro bono. LASN responded that they were still waiting to
13		receive Appellant's intake to determine whether Appellant was eligible for pro bono
14		representation.
15	5.	On December 7, 2020, the date Appellant's Opening Brief deadline, I was notified by
16 17		LASN that Appellant was determined eligible to receive pro bono representation and that
17		I could begin working on the case.
19	6.	Declarant has not had the opportunity to completely review the appendix and will more
20		than likely need to speak with Appellant prior to filing the Opening Brief.
21	7.	Declarant is asking for an extension of ninety (90) days to familiarize himself with the
22		case information, appendices, and communicate with Appellant if necessary.
23 24	8.	This Motion is made in good faith and not for the purpose of delay.
24		I declare under penalty of perjury that the foregoing is true and correct.
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28		<u>/s/ L. Hendron</u> LANCE J. HENDRON, ESQ.

1	<u>CERTIFICATE OF SERVICE</u>
2	I hereby certify that this document was filed electronically with the Nevada Supreme
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4	Court on the <u>11th</u> day of February, 2021. Electronic Service of the foregoing document
5	shall be made in accordance with the Master Service List as follows:
6	I further certify that I served a copy of this document by mailing a true and
7	
8	correct copy thereof, postage pre-paid, addressed to:
9	RONALD DAVID HARRIS #584414 NECX
10	P.O. BOX 5000
11	Mountain City, TN 37683-5000
12	JENNIFER FIGUEROA 3874 CALI DE ESTE
13	LAS VEGAS, NV 89121
14	Respondent in Proper Person
15	
16	BY <u>/s/ Mary Minter</u>
17	Employee of Hendron Law Group, LLC
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