

IN THE SUPREME COURT OF THE STATE OF NEVADA

Nathan Ohm,
Petitioner,

vs.

Eighth Judicial District Court, and the
Honorable Kathleen Delaney, District
Court Judge,
Respondents,

And

City of Henderson,
Real Party in Interest.

) Supreme Court Case No.: 81960

) Electronically Filed
) Dec 28 2020 05:42 p.m.

) **PETITIONER'S MOTION TO**
) **EXTEND TIME TO FILE ORIGINAL**
) **PETITION**

) **Extension Requested: 30 days**

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COMES NOW, Petitioner NATHAN OHM, by and through is attorney of record, KELSEY BERNSTEIN, ESQ., of Nevada Defense Group, hereby moves this Court for an extension of time within which to file the Original Petition. This Motion is based on the following memorandum, declaration of counsel and all pleadings and papers on file herein.

RESPECTFULLY SUBMITTED this 28th day of December, 2020.

By: 

Alexis Minichini, Esq.
Nevada Bar No.: 15438
Nevada Defense Group
714 S. Fourth Street
Las Vegas, NV 89101
Attorney for Petitioner

MEMORANDUM/DECLARATION

Counsel, Alexis Minichini, Esq., is a duly licensed attorney in the State of Nevada and is an associate of Nevada Defense Group, which has been retained to represent Appellant Nathan Ohm in the instant appeal.

Appellant's Opening Brief on Jury Trial Petition is due on December 29, 2020.

Counsel handling this matter, Kelsey Bernstein, has contracted COVID-19 and is currently undergoing treatment for the same.


This is the first written request for an extension of time filed by Appellant in this matter.

No parties in this appeal will suffer prejudice or harm as a result of the requested extension.

I declare under penalty of perjury that the information set forth in this Memorandum is true and correct.

DATED this 28 day of December, 2020.

NEVADA DEFENSE GROUP

By: 

Alexis Minichini, Esq.
Nevada Bar No.: 15438
Nevada Defense Group

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 28th day of December, 2020, a true and correct copy of the foregoing **MOTION FOR EXTENSION OF TIME** was served via electronic service through the Court's electronic filing system per NEFCR 9 and/or that the same was served via US mail, certified postage prepaid, and addressed as follows:

Marc Schifalacqua, Esq.
243 S. Water Street, MSC 711
Henderson, Nevada 89015
Attorney for Real Party in Interest
City of Henderson



Employee of Nevada Defense Group