

IN THE SUPREME COURT OF THE STATE OF NEVADA

* * * * *

KATHERINE DEE FLETCHER,)	
)	
Appellant,)	No. 82047
vs.)	
)	
THE STATE OF NEVADA,)	
)	
Respondent.)	
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Electronically Filed
Mar 25 2021 10:35 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

FIRST MOTION FOR EXTENSION OF TIME
TO FILE APPELLANT’S OPENING BRIEF

Appellant’s Opening Brief is currently due April 01, 2021. Appellant, KATHERINE DEE FLETCHER, by and through his attorney of record, THOMAS L. QUALLS, ESQ., requests a third extension of time in which to file the Opening Brief in this matter by 45 days.

This extension is necessary for adequate review and compilation of the legal issues and in order to provide Appellant with effective assistance of counsel. Additionally, COVID-19 has presented unprecedented challenges to the undersigned and his practice.

This is Appellant’s first request for an extension of time. And it is presented in good faith and not for the purpose of delay. It is respectfully

submitted that the following circumstances constitute compelling and exceptional circumstances and good cause for the additional time:

(1) The undersigned is a sole-practitioner, and for a full year, since March of 2020, the undersigned counsel has been working without an assistant, due to the COVID-19 global pandemic, so he is and has been performing both jobs daily;

(2) During all this time, in addition to managing his law practice, the undersigned has been supervising his son's distance learning. All of these factors require more time than usual to request, organize, review, and prepare these briefings;

(3) The undersigned recently hired an assistant and is working diligently to get through the backlog of briefs, correspondence, and other matters. All transcripts have been received now, and the undersigned does not anticipate any further requests for extensions in this matter.

AFFIRMATION PURSUANT TO NRS 239B.030

The undersigned does hereby affirm that this document does not contain the social security number of any person.

RESPECTFULLY SUBMITTED this 25th day of March, 2021.

/s/ Thomas L. Qualls
THOMAS L. QUALLS, ESQ.
Attorney for Appellant,
KATHERINE DEE FLETCHER

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b) and NEFR 9, I certify that I am an employee of the Law Office of Thomas L. Qualls, Ltd., that I am over the age of 18 years and not a party to the within action. I am familiar with the practice of the office regarding the service of documents and that, in accordance therewith, I caused a true and correct copy of the attached ***First Motion for Extension of Time to File Appellant's Opening Brief*** to be served via the following method(s):

- ☒ The Nevada Supreme Court's electronic filing system upon all counsel of record.
- ☒ USPS, by placing a metered, addressed envelope containing the same in First Class Mail to the following:

KATHERINE DEE FLETCHER

DATED: March 25, 2021.

/s/ Thomas L Qualls
Thomas L. Qualls

Law Office of Thomas L.
Qualls, Esq.
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Reno, Nevada 89509