

1 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

2
3 THOMAS CASH

S.Ct. No. 82060

4 Appellant,

Electronically Filed
Dec 06 2021 10:26 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

5 vs.

6
7 WILLIAM GITTERE,

8 Warden Ely State Prison

9 Respondent.

10
11 **MOTION FOR ENLARGEMENT OF TIME**
12 **(First Request)**

13 COMES NOW, THOMAS CASH, by and through his counsel in this
14 matter, JEAN J. SCHWARTZER, ESQ., and moves this Court for the
15 second time for an enlargement of time of two (2) days from
16 December 6, 2021 to file Appellant's Reply Brief, making said Brief due
17 December 8, 2021. This motion is based upon the following memorandum
18 and all papers and pleadings on file herein.
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20
21

22 DATED this 6th day of December, 2021.

23 /s/ Jean Schwartzer
24 JEAN J. SCHWARTZER, ESQ
25 Nevada State Bar No. 11223
26 Law Office of Jean J. Schwartzer
27 170 S. Green Valley Pkwy. #300
28 Henderson, Nevada 89012
 (702) 979-9941
 Jean.schwartzter@gmail.com
 Counsel for Appellant

1 MEMORANDUM

2 I, JEAN J. SCHWARTZER, ESQ., am the attorney in the above-captioned
3 case. Pursuant to NRAP 31(b)(3)(B), this Court may grant a second
4 motion for extension of time for filing a brief upon a showing of
5 extreme need. This is Appellant's second but very short request for an extension of
6 time.
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8 With respect to extreme need, counsel has been taking care of her
9 husband post-surgery for the last four weeks and it has proven to be more time
10 consuming than she originally thought it would be. Additionally, counsel has
11 been caring for two children, which were out of school for a few days due to
12 Thanksgiving. Therefore, Appellant moves for an enlargement of time of
13 only two (2) days within which to file Appellant's Reply Brief up to and
14 including December 8, 2021.
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1 This Motion is made in good faith and not for the purposes of undue delay. I
2 declare under penalty of perjury the factual representations set forth in the
3 foregoing memorandum are true and correct.
4

5
6 DATED this 6th day of December, 2021.
7

8
9 /s/ Jean Schwartzer
10 JEAN J. SCHWARTZER, ESQ
11 Nevada State Bar No. 11223
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY AND AFFIRM that this document was filed electronically foregoing document shall be made in accordance with the Master Service List as follows:

AARON FORD, ESQ

ALEXANDER G. CHEN, ESQ.

BY: /s/ Jean Schwartz
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