

IN THE SUPREME COURT OF THE STATE OF NEVADA

THOMAS L. CORNWELL, A
NEVADA RESIDENT,

Appellant,

vs.

NEIL E. SCHULTZ, A NEVADA
RESIDENT, A/K/A THE NEIL E.
SCHULTZ TRUST DATED
JANUARY 29, 2016

Respondents.

CASE NO. 82106

Electronically Filed
Jun 01, 2021 01:12 p.m.
First Judicial District Court - Carson
County Elizabeth A. Brown
Clerk of Supreme Court
Case No. 18 RP 00018 1B

**MOTION TO EXTEND TIME TO
FILE OPENING BRIEF**

Pursuant to NRAP 26, pro bono counsel Eric R. Olsen of the law firm Garman Turner Gordon LLP, file this Motion to Extend Deadline to File Opening Brief on behalf of Appellant THOMAS L. CORNWELL.

DATED this 1st day of June , 2021.

GARMAN TURNER GORDON
LLP

/s/ Eric R. Olsen

ERIC R. OLSEN

Nevada Bar No. 3127

7251 Amigo St., Suite 210

Las Vegas Nevada 89119

MEMORANDUM OF POINTS AND AUTHORITIES

Nevada Rule of Appellate Procedure 26(b)(1)(A) provides that for good cause, the court may permit an act to be done after the time expires.

For good cause, the court may extend the time prescribed by these Rules or by its order to perform any act, or may permit an act to be done after that time expires...”

Id.

In this instance, good cause exists for an extension of time for Appellant to file his opening brief. The First Judicial District Court does not provide transcripts of hearings. Nor did either party hire a court reporter to prepare a transcript of the proceedings of record. As such, after appointment of the pro bono counsel was required to obtain the audio recordings of the hearings and arrange to have them transcribed by a Court reporter. That took some time to accomplished. Counsel did receive transcripts on or about May 19, 2021. However, this did not allow an adequate length for review of the record and preparation of an Opening Brief.

Therefore, Appellant and Pro Bono Counsel request an extension for a minimum of 30 days to file the Opening Brief.

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CONCLUSION

Based upon the foregoing, and for good cause shown, the Appellant asks that the Supreme Court allow Appellant and Pro Bono Counsel an extension of time of at least 30 days from the current deadline of June 7, 2021, in which to file the Opening Brief, pursuant to NRAP 26.

DATED this 1st day of June, 2021.

GARMAN TURNER GORDON LLP

/s/ Eric R. Olsen
ERIC R. OLSEN
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7251 Amigo St., Suite 210
Las Vegas Nevada 89119

CERTIFICATE OF SERVICE

I certify that on the 1st day of June, 2021, I served a copy of this completed **MOTION TO EXTEND TIME TO FILE OPENING BRIEF** upon all counsel of record:

- ☐ By personally serving it upon him/her; or
- ☒ By E-Service through Nevada Supreme Court; email and by first class mail with sufficient postage prepaid to the following address(es):
(NOTE: If all names and addresses cannot fit below, please list names below and attach a separate sheet with the addresses.)

John Bartlett, Esq.
755 N. Roop St.
Carson City, NV 89701
Attorneys for Respondent

/s/ CM Wrangham
An employee of
GARMAN TURNER GORDON LLP