

1
2 Lee E. Szymborski
3 4605 Black Stallion Avenue
4 North Las Vegas, Nevada
5 (702) 726-9956
6
7

FILED

JUN 16 2020

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
BY S. Young
DEPUTY CLERK

8 **IN THE SUPREME COURT OF THE STATE OF NEVADA**
9

10 LEE E. SZYMBORSKI

11 Plaintiff,

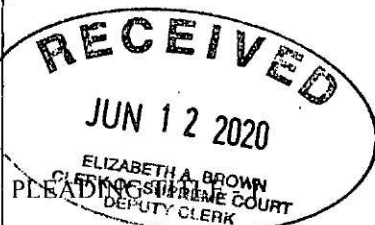
CASE NO. 81109

12 VS.

13
14 SPRING MOUNTAIN TREATMENT
15 CENTER, DOES 1-XX, INCLUSIVE,
16 AND ROE CORPORATIONS 1-XX,
17 INCLUSIVE

18 DEFENDANTS
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**MOTION FOR A 30-DAY
EXTENSION OF TIME TO FILE
FILE OPENING INFORMAL
BRIEF**



20-22434

1
2 Appellant Lee E. Szymborski respectfully requests a 30-day extension
3
4 of time, to and including September 30 2020, in which to file the opening
5 informal brief in this Appeal.

6
7 Appellant has been unable to do the necessary research in this case due to the Clark
8 County Law Library being closed due to the Covid-19 Virus shut down ordered by
9 Governor Steve Sisolak and Appellant has just discovered that it reopened on June
10 1, 2020.

11
12 Appellant is permanently mentally and physically disabled of which the Court has
13 record of and is a Qualified Disabled individual and in a Protected Class of
14 Citizens under the umbrella of Title 11,111, of the Americans with Disabilities Act
15 (ADA) as it applies to the Parties, and is dependent on a licensed, bonded Senior
16 Companion, Celia Ramirez as his sole means of transportation Mondays from 9
17 AM-1 PM. Appellant has qualified for assistance by the sponsor, The Las Vegas
18 Jewish Center.
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22 This request is necessary to have adequate time to prepare the brief. The current
23 deadline is August 30, 2020. Appellant is requesting thirty (30) days from the date
24 of the current deadline. Appellant will perform diligence and the Brief will be filed
25 within the time requested. This Motion is not made for the purpose of delay.
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4 Respectfully Submitted,

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7 Lee E. Szymborski June 10, 2020
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18 Appellant
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8 **IN THE SUPREME COURT OF THE STATE OF NEVADA**
9

10 LEE E. SZYMBORSKI

11 Plaintiff,

CASE NO. 81109

12 VS.
13

14 SPRING MOUNTAIN TREATMENT
15 CENTER, DOES 1-XX, INCLUSIVE,
16 AND ROE CORPORATIONS 1-XX,
17 INCLUSIVE

18 DEFENDANTS
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CERTIFICATE OF SERVICE

25 **RECEIVED**

26 JUN 12 2020

27 ELIZABETH A. BROWN
CLERK OF SUPREME COURT
DEPUTY CLERK
28

PLEADING TITLE - I


1
2 I HEREBY CERTIFY that on June 10, 2020, I served a true and
3 correct copy of the forgoing MOTION FOR A THIRTY DAY EXTENSION OF
4 TIME TO FILE OPENING INFORMAL BRIEF as follows:
5

6 U. S Mail First Class postage pre-paid to the following parties at their
7 last known address:
8

9 Hall Prangle & Schoonveld. LLC

10 1140 North Town Center Drive, STE. 350

11 Las Vegas, Nevada 89144
12
13
14

15  6/10/2020
16

17 **Lee Szymborski**
18 4605 Black Stallion Ave
19 North Las Vegas, NV 89031-2104
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