

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

ANTHONY ROY SALAZAR,  
Appellant.

CASE NO.: 82667

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DISTRICT COURT CASE NO.  
D611509

Elizabeth A. Brown  
Clerk of Supreme Court

**UNOPPOSED MOTION FOR EXTENSION TO FILE APPELLANT'S  
OPENING BRIEF AND APPENDIX [SECOND REQUEST]**

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Pro Bono Project*

**UNOPPOSED MOTION FOR EXTENSION TO FILE APPELLANT’S  
OPENING BRIEF AND APPENDIX [SECOND REQUEST]**

Appellant ANTHONY ROY SALAZAR, by and through her counsel, Margaret A. McLetchie of McLetchie Law, hereby respectfully requests thirty (30) days, until March 4, 2022, to file the Opening Brief and Appendix, which is currently due on February 2, 2022. This is Appellant’s second request for an extension in this matter. This motion is based on the following memorandum and all papers and pleadings on file herein.

DATED this the 24<sup>th</sup> day of January, 2022.

*/s/ Margaret A. McLetchie*

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Margaret A. McLetchie, Nevada Bar No. 10931  
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with the Legal Aid Center of Southern Nevada  
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## MEMORANDUM

Appellant ANTHONY SALAZAR (“Monica Salazar”<sup>1</sup>), by and through her undersigned counsel of record, moves this Court pursuant to Nevada Rule of Appellate Procedure 31(b) for a 30-day extension of time to file her Opening Brief and Appendix.

Ms. Salazar’s Opening Brief and Appendix was originally due January 3, 2022. The Court granted Appellant’s first request for a thirty (30) day extension, making Ms. Salazar’s Opening Brief and Appendix currently due on February 2, 2022.

This Court cautioned in its order that, pursuant to NRAP 31(b)(3)(B), no further extensions shall be permitted absent extraordinary circumstances and extreme need. Here, there are extraordinary circumstances and extreme need to extend the deadline from February 2, 2022 to March 4, 2022:

1. On January 12, 2022, undersigned counsel began suffering symptoms of fever, cough, headache, loss of voice, and fatigue, rendering her unable to perform work.
2. That same day, undersigned counsel tested positive for COVID-19.

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<sup>1</sup> Ms. Salazar is a transgender woman and desires to be called by the name and gender pronouns that align with her identity. As such, Appellant will be referred to in these proceedings using she/her pronouns and the name Monica Salazar.

3. Undersigned counsel was rendered practically incapable of performing legal work from January 12 through January 17, 2022 while recovering, but diligently attempted to meet or extend deadlines in her matters with the assistance of the other two attorneys at McLetchie Law.

4. Undersigned counsel quarantined herself until testing negative on January 18, 2022, and has continued to perform legal work since then despite lingering symptoms of COVID-19, including fatigue.

5. Shortly after undersigned counsel's return to the office, on January 21, 2022, Leo S. Wolpert, an associate at undersigned's firm, tested positive for COVID-19.

6. Mr. Wolpert developed symptoms of headache, fatigue and chills which rendered him practically incapable of performing legal work from January 21 through January 23.

7. At the time of filing, Mr. Wolpert is currently quarantining himself and is attempting to work from home while recovering.

8. Although undersigned counsel has now returned to work, the prolonged incapacitation of two-thirds of the firm's attorneys has caused case management backlogs that necessitate this extension.

9. Appellant's Opening Brief and Appendix is currently due February 2, 2022. An extension is necessary in this case due to the aforementioned

circumstances and to ensure proper briefing. Appellant thus respectfully requests an extension of thirty (30) days for the Opening Brief and Appendix, which would move that deadline from February 2, 2022, to March 4, 2022.

The undersigned declares under penalty of perjury the factual representations set forth in the foregoing memorandum are true and correct.

DATED this 24<sup>th</sup> day of January, 2022.

*/s/ Margaret A. McLetchie*

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*Counsel for Appellant SALAZAR, in conjunction*

*with the Legal Aid Center of Southern Nevada*

*Pro Bono Project*

## CERTIFICATE OF SERVICE

I hereby certify that the foregoing UNOPPOSED MOTION FOR EXTENSION TO FILE APPELLANT'S OPENING BRIEF AND APPENDIX [SECOND REQUEST] was filed electronically with the Nevada Supreme Court on the 24th day of January, 2022. Electronic service of the foregoing document shall be made in accordance with the Master Service List as follows:

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/s/ Leo S. Wolpert  
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