1	LUCAS J. GAFFNEY, ESQ.		
2	Nevada Bar No. 12373		
	GAFFNEY LAW 1050 Indigo Drive, Suite 120		
3	Las Vegas, Nevada 89145	Electronically File Aug 12 2021 01:0	d 5 n m
4	Telephone: (702) 742-2055	Elizabeth A. Brow	'n
5	Facsimile: (702) 920-8838	Clerk of Supreme	Court
6	lucas@gaffneylawlv.com Attorney for Appellant		
	IN THE SUPREME COUR	RT OF THE STATE OF NEVADA	
7)		
8		CASE NO.: 82700	
9	SHAWN GLOVER JR.,		
10	Appellant,	APPELLANT'S MOTION TO ENLARGE TIME TO	
10	VS.	FILE OPENING BRIEF AND	
11	THE STATE OF NEVADA,	APPENDIX	
12	Respondent.	(2nd Request)	
13			
14	Appellant, SHAWN GLOVER JR., by and through his counsel, LUCAS J.		
15	CAEENEY ESO homely sylmits his	Mation to Eulerge Time to Eile the	
16	GAFFNEY, ESQ., hereby submits his Motion to Enlarge Time to File the Appellant's Opening Brief and Appendix.		
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ARGUMENT

GOOD CAUSE EXISTS TO ENLARGE THE TIME TO FILE THE APPELLANT'S OPENING BRIEF AND APPENDIX.

Nevada Rule of Appellate Procedure 26(b)(1)(A) provides in relevant part:

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.

Here, the Appellant, Shawn Glover Jr.'s, Opening Brief and Appendix are due August 12, 2021¹. Mr. Glover respectfully requests an extension of thirty (30) days to file the Opening Brief and Appendix. Mr. Glover submits there is good cause to grant the instant request for the following reason.

On or about July 20, 2021, counsel for Mr. Glover received written correspondence from Mr. Glover discussing several issues Mr. Glover believes should be included in the Appellant's Opening Brief. The issues Mr. Glover raised were not apparent upon counsel's review of the record and requires counsel to consult with Mr. Glover to clarify the issues. Thus far, counsel has been unsuccessful in communicating by telephone with Mr. Glover who is currently housed in Ely State Prison. As such, communication between counsel and Mr. Glover has been reduced to writing, which has slowed the communication process.

¹ On July 29, 2021, this Court granted counsel's telephonic request for a fourteen (14) day extension to file the Appellant's Opening Brief and Appendix.

As of today (August 12, 2021), counsel is awaiting Mr. Glover's reply to written correspondence sent several weeks ago.

Accordingly, counsel is requesting additional time to consult with Mr. Glover to determine whether the issues have merit and should be included in the Appellant's Opening Brief. Counsel believes in good faith that a thirty (30) day extension of the briefing schedule will allow him to clarify the issues with Mr. Glover, investigate the issues, and incorporate them into the Appellant's Opening Brief, if necessary.

CONCLUSION

Based on the foregoing, counsel submits that good cause exists to enlarge the time to file the Appellant's Opening Brief and Appendix by thirty (30) days.

DATED this 12th day of August, 2021.

Respectfully submitted,

By: /s/Lucas J. Gaffney
Lucas J. Gaffney, Esq.
Nevada Bar No. 12373
1050 Indigo Drive, Suite 120
Las Vegas, Nevada 89145
Telephone: (702) 878-2889

CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on August 12, 2021. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

> AARON D. FORD Nevada Attorney General

STEVEN WOLFSON Clark County District Attorney

LUCAS J. GAFFNEY Counsel for Appellant

/s/ Lucas Gaffney By: An employee of GAFFNEY LAW