

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

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3   JOHN CHAINYK, an individual,   )  
4   Appellant,                            )  
5   vs.                                    )  
6   THE ESTATE OF DONALD E.        )  
7   WEBSTER,                            )  
8   Respondent.                         )

Case #82745

Electronically Filed  
May 23 2021 02:50 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

9                                   **MOTION TO ENLARGE TIME TO FILE DOCKETING STATEMENT**  
10                                   **(Second Request)**

11       Appellants, JOHN CHAINYK, AN INDIVIDUAL, by and through his attorney,  
12   LEO FLANGAS, ESQ., hereby moves this Court for an Order enlarging the time within  
13   which to file the Docketing Statement to thirty (30) days after this Court grants the instant  
14   motion.

15       This Motion is brought pursuant to NRAP 26(b)(1)(A) on the grounds that good cause  
16   exists to enlarge the time to file the Docketing Statement and is based on this motion, the  
17   attached Memorandum of Points and Authorities and Declaration of Leo Flangas, Esq., the  
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1 papers and pleadings on file and on such other oral or documentary evidence that may be  
2 subsequently presented.

3 Dated this 23 day of May, 2021.  
4

5  
6 By: /s/ Leo Flangas  
7 Leo P. Flangas, Esq.  
8 Nevada Bar No.5637  
9 Flangas Law Firm, Ltd.  
10 600 S. Third Street  
11 Las Vegas, Nevada 89101  
12 Telephone: (702) 384-1990  
13 Facsimile: (702) 384-1009  
14 E-mail: Leo@FlangasLawFirm.com  
15 *Attorneys Appellant*

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17 **MEMORANDUM OF POINTS AND AUTHORITIES**

18 **I.**

19 **GOOD CAUSE EXISTS TO ENLARGE TIME**  
20 **TO FILE FAST TRACK STATEMENT AND APPENDIX**

21 NRAP 26(b)(1)(A) provides in relevant part:

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

25 Mr. Flangas respectfully requests the Court to grant an extension of time to file  
26 Docketing Statement. Mr. Flangas is currently short staffed with the current COVID-19  
27 pandemic.  
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**CONCLUSION**

Due to the foregoing, it is respectfully submitted that good cause exists to grant the motion to enlarge the time within which to file Docketing Statement for thirty (30) days from the date this Court approves this motion.

Dated this 23 day of May, 2021.

By: /s/ Leo Flangas  
Leo P. Flangas, Esq.  
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*Attorneys Appellant*

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3 **DECLARATION OF LEO FLANGAS**

4 LEO FLANGAS declares as follows:

- 5 1. I am attorney licensed to practice before all the courts of the State of Nevada. All of  
6 the fact set forth here are true of my own personal knowledge. If called to testify I  
7 could, and would, testify as to them.
- 8 2. I represent the Appellant in the above referenced case.
- 9 3. I am currently short staffed with the current COVID-19 pandemic.
- 10 4. This is my Second Request for an extension of time to file the Docketing Statement.

11 I declare under penalty of perjury under the laws of the State of Nevada that the foregoing  
12 is true and correct.

13 Executed this 23<sup>rd</sup> day of May 2021 at Las Vegas, Nevada.

14  
15 /s/ Leo Flangas  
16 LEO FLANGAS, Esq.  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 23rd day of May 2021 that I served the foregoing **MOTION TO ENLARGE TIME TO FILE DOCKETING STATEMENT (Second Request)** on all interested parties by placing a true and correct copy thereof in a sealed envelope with first class postage thereon and depositing same in the United States Mail at Las Vegas, Nevada addressed as follows:

GALLIAN WELKER & BECKSTROM, L.C.

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*Attorneys for Plaintiff*

/s/ Natasha Smith

An Employee of the Firm