

1 **IN THE SUPREME COURT OF THE STATE OF NEVADA**
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3 THOMAS CASH

S.Ct. No. 82060

4 Appellant,

Electronically Filed
Nov 05 2021 11:39 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

5 vs.
6

7 WILLIAM GITTERE,

8 Warden Ely State Prison

9 Respondent.
10

11 **MOTION FOR ENLARGEMENT OF TIME**
12 **(First Request)**

13 COMES NOW, THOMAS CASH, by and through his counsel in this
14 matter, JEAN J. SCHWARTZER, ESQ., and moves this Court for the first
15 time for an enlargement of time of thirty (30) days from November 5,
16 2021 to file Appellant's Reply Brief, making said Brief due December 5, 2021.
17 This motion is based upon the following memorandum and all papers and
18 pleadings on file herein.
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20

21 DATED this 5th day of November, 2021.
22

23 /s/ Jean Schwartzer
24 JEAN J. SCHWARTZER, ESQ
25 Nevada State Bar No. 11223
26 Law Office of Jean J. Schwartzer
27 170 S. Green Valley Pkwy. #300
28 Henderson, Nevada 89012
 (702) 979-9941
 Jean.schwartzter@gmail.com
 Counsel for Appellant

1 **MEMORANDUM**

2 I, JEAN J. SCHWARTZER, ESQ., am the attorney in the above-captioned
3 case. Pursuant to NRAP 31(b)(3)(B), this Court may grant a first motion
4 for extension of time for filing a brief upon a showing of good cause.
5 This is Appellant's first request for an extension of time.
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7 With respect to good cause, counsel had the stomach flu three weeks ago;
8 her son had the same illness two weeks ago; and her daughter had the same illness
9 last week. Therefore, counsel was not able to work full time for the past
10 few weeks. Additionally, counsel's husband is having surgery on Monday and he
11 will be immobile for 2-3 weeks and only partially mobile for another 4-5
12 weeks. Therefore, Appellant moves for an enlargement of time of thirty
13 (30) days within which to file Appellant's Reply Brief up to and including
14 December 5, 2021.
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1 This Motion is made in good faith and not for the purposes of undue delay. I
2 declare under penalty of perjury the factual representations set forth in the
3 foregoing memorandum are true and correct.
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6 DATED this 5rd day of November, 2021.
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8
9 /s/ Jean Schwartzer
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AARON FORD, ESQ

ALEXANDER G. CHEN, ESQ.

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