

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

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3 GENARO RICHARD PERRY,

4 Petitioner,

5 vs.

6 RENEE BAKER, WARDEN

7 Lovelock Correctional Center,

8 Respondent.

S.Ct. No. 82060

D.C. No. C298879-1

Electronically Filed
Dec 13 2021 08:17 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

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10 **MOTION FOR ENLARGEMENT OF TIME**

11 **(First Request)**

12 COMES NOW Appellant, GENARO PERRY, by and through his counsel in

13 this matter, JEAN J. SCHWARTZER, ESQ., and moves this Court for the first time

14 for an enlargement of time of two (2) week from December 13, 2021 to file

15 Appellant's Reply Brief, making said brief due December 27, 2021. This motion is

16 based upon the following memorandum and all papers and pleadings on file herein.

17 Dated this 13th day of December, 2021.

18

19 Respectfully submitted,

20

21 /s/ Jean J. Schwartzer

22 JEAN J. SCHWARTZER, ESQ.

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27 Phone: 702-979-9941

28 jean.schwartzter@gmail.com

 Counsel for Appellant

1 **MEMORANDUM**

2 I, JEAN J. SCHWARTZER, ESQ., am the attorney in the above-captioned case.
3 Appellant's Reply Brief is due on December 13, 2021. Pursuant to NRAP 31(b)(3)(B),
4 this Court may grant a first motion for extension of time for filing a Reply Brief upon
5 a showing of good cause. This is Appellant's first request for an extension of time.

6 With respect to good cause, counsel's husband had surgery about five weeks
7 ago, was immobile for three weeks afterwards, and is currently only partially mobile,
8 which continue to be the case for an additional two to three more weeks. Counsel has
9 had to limit her work hours due to caring for him as well as her two children.
10 Therefore, appellant requests two (2) additional weeks to complete and file the Reply
11 Brief.

12 This Motion is made in good faith and not for the purposes of undue delay.

13 I declare under penalty of perjury the factual representations set forth in the
14 foregoing memorandum are true and correct.

15 Dated this 13th day of December, 2021.

16
17 Respectfully submitted,

18 /s/ Jean J. Schwartzer
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3 **CERTIFICATE OF SERVICE**

4 I HEREBY CERTIFY AND AFFIRM that this document was filed
5 electronically with the Nevada Supreme Court on December 13th, 2021. Electronic
6 Service of the foregoing document shall be made in accordance with the Master
7 Service List as follows:

8 AARON FORD, ESQ.
9 Nevada Attorney General

10 ALEXANDER G. CHEN, ESQ.
11 Chief Deputy District Attorney

12 /s/ *Jean J. Schwartzer*
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