1	IN THE COURT OF APPEALS OF THE STATE OF NEVADA
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4	GENARO RICHARD PERRY, Datitionar S.Ct. No. 8293 Electronically Filed Mar 08 2022 10:33 p.m.
5	Elizabeth A. Brown
6	vs. D.C. No. C298
7	RENEE BAKER, WARDEN
8	Lovelock Correctional Center,
9	Respondent.
10	MOTION FOR ENLARGEMENT OF TIME
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12	COMES NOW Appellant, GENARO RICHARD PERRY, by and through his
13	counsel in this matter, JEAN J. SCHWARTZER, ESQ., and moves this Court for the
14	first time for an enlargement of time of twenty (20) days from March 8, 2022 to file
15	Appellant's Petition for Rehearing, making said brief due March 28, 2022. This
16 17	motion is based upon the following memorandum and all papers and pleadings on file
17 18	herein.
18	Deted this 8 th day of March 2022
20	Dated this 8 th day of March, 2022.
21	Respectfully submitted,
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23	/s/ Jean J. Schwartzer JEAN J. SCHWARTZER, ESQ.
24	Law Office of Jean J. Schwartzer 170 S. Green Valley Parkway #300
25	170 S. Green Valley Parkway #300 Henderson, NV 89012 Phone: 702-979-9941
26	jean.schwartzer@gmail.com Counsel for Appellant
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MEMORANDUM

I, JEAN J. SCHWARTZER, ESQ., am the attorney in the above-captioned case. Appellant's Petition for Rehearing is due today, March 8, 2022. Pursuant to NRAP 40(a)(1), this Court may grant an extension of time for filing a Petition for Rehearing.

Counsel for Appellant will be withdrawing as counsel pursuant to Appellant's request. Counsel has drafted a letter to Appellant detailing what his options are with respect to a Petition for Rehearing and a Petition for Supreme Court Review as well the applicable statutes. This letter will be mailed to him tomorrow. Counsel will file the Notice of Withdrawal tomorrow as well.

Therefore, so as to preserve Appellant's time to file one of the above referenced
Petitions, Counsel requests that this Court give Appellant an additional twenty (20)
days to file a Petition for Rehearing or a Petition for Supreme Court Review in the
instant case.

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

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

Dated this 8th day of March, 2022.

Respectfully submitted,

/s/ Jean J. Schwartzer JEAN J. SCHWARTZER, ESQ. Law Office of Jean J. Schwartzer 170 S. Green Valley Parkway #300 Henderson, NV 89012 Phone: 702-979-9941 jean.schwartzer@gmail.com Counsel for Appellant

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1	CERTIFICATE OF SERVICE
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3	I HEREBY CERTIFY AND AFFIRM that this document was filed
4	electronically with the Nevada Supreme Court on March 8 th , 2022 Electronic Service
5	of the foregoing document shall be made in accordance with the Master Service List
6	as follows:
7	
8	AARON FORD, ESQ. Nevada Attorney General
9	ALEXANDER CHEN, ESQ.
10	Chief Deputy District Attorney
11	
12	/s/ Jean J. Schwartzer JEAN J. SCHWARTZER, ESQ.
13	Law Office of Jean J. Schwartzer
14	170 S. Green Valley Parkway #300 Henderson, NV 89012
15	Phone: 702-979-9941 jean.schwartzer@gmail.com Counsel for Appellant
16	Counsel for Appellant
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