

IN THE SUPREME COURT OF THE STATE OF NEVADA

TODD M. LEVENTHAL,

Appellant,

v.

THE STATE BAR OF NEVADA,

Respondent.

Electronically Filed
Dec 16 2021 01:15 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

CASE NO: 83245

MOTION FOR ENLARGEMENT OF TIME (FIRST REQUEST)

COMES NOW the State Bar of Nevada, by DANIEL M. HOOGE, Bar Counsel, through his assistant bar counsel, GERARD GOSIOCO, and moves this Court for an enlargement of time within which to file Respondent's Answering Brief. This motion is based on the following memorandum, declaration of counsel and all papers and pleadings on file herein.

Dated this 16th day of December 2021.

Respectfully submitted,

DANIEL M. HOOGE
Bar Counsel
Nevada Bar No. 10620

BY



GERARD GOSIOCO
Assistant Bar Counsel
Nevada Bar No. 14371
Office of Bar Counsel

MEMORANDUM

I, GERARD GOSIOCO, am a duly licensed attorney in the State of Nevada and am employed by the Office of Bar Counsel. I am the lead attorney in the above-captioned case. Respondent's Answering Brief is currently due on Wednesday, December 22, 2021. The State Bar requests a thirty-day (30) extension of time in which to file its Answering Brief. NRAP 31(b)(3).

Appellant filed his Opening Brief on November 22, 2021, after receiving two (2) extensions of time. Appellant's Opening Brief raises several issues and contains a record on appeal of over 1,150 pages. The issues raised by Appellant require a thorough examination of the record and related case law.

Due to the above-described circumstances, Respondent respectfully requests the Court's permission for an extension of time of thirty (30) days to file its Answering Brief. If granted, the new filing date for Respondent's Answering Brief would be due on or before Friday, January 21, 2022.

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This is Respondent's first Motion for Enlargement of Time, and this motion is made in good faith and not for purposes of undue delay.

DATED this 16th day of December 2021.

Respectfully submitted,

DANIEL M. HOOGE
Bar Counsel
Nevada Bar No. 10620



BY

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CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on December 16, 2021. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

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BY *Sonia Del Rio*
Sonia Del Rio,
State Bar of Nevada