

IN THE SUPREME COURT OF THE STATE OF NEVADA

TODD M. LEVENTHAL,

Appellant,

v.

THE STATE BAR OF NEVADA,

Respondent.

Electronically Filed
Jan 13 2022 05:00 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

CASE NO: 83245

MOTION FOR ENLARGEMENT OF TIME (SECOND 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 13th day of January 2022.

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 was originally due on Wednesday, December 22, 2021. On December 16, 2021, Respondent filed a Motion for Enlargement of Time (First Request), which was granted on December 20, 2021. Respondent's Answering Brief is currently due on Friday, January 21, 2022. The State Bar requests a second 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. Additionally, the issues raised require a much more thorough review of record as well as the case law, rules, and professional ethics authorities cited in Appellant's Opening Brief.

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 Monday, February 21, 2022.

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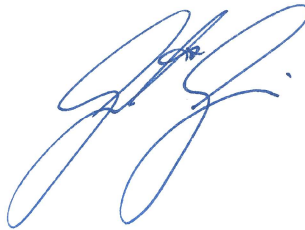
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This is Respondent's second Motion for Enlargement of Time, and this motion is made in good faith and not for purposes of undue delay.

DATED this 13th day of January 2022.

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 January 13, 2022. 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