#### IN THE SUPREME COURT OF THE STATE OF NEVADA

FILED

UEC 10 2021

BRIAN C. PADGETT,

Appellant,

CASE NO:

83347

v.

THE STATE BAR OF NEVADA,

Respondent.

### 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 15th day of December 2021.

Respectfully submitted,

DANIEL M. HOOGE Bar Counsel Nevada Bar No. 10620

RY

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 Monday, December 20, 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 18, 2021, after receiving four (4) extensions of time. Appellant's Opening Brief raises several issues and contains a record on appeal of over 2,300 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 Wednesday, January 19, 2022.

///

111

111

111

111

111

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 15th 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 State Bar of Nevada Office of Bar Counsel 3100 West Charleston Boulevard Suite 100 Las Vegas, Nevada 89102 (702) 382-2200

## **CERTIFICATE OF SERVICE**

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on December 15, 2021. Electronic Service of the foregoing document is as follows:

brian.padgett@icloud.com; brian@briancpadgett.com

BY Laura Peters

Laura Peters, an employee of the State Bar

# 2021.12.15.extension of time

Final Audit Report

2021-12-15

Created:

2021-12-15

By:

Laura Peters (laurap@nvbar.org)

Status:

Signed

Transaction ID:

CBJCHBCAABAAnd45b-walMPSJg1CwBY7coQFBRY4klve

## "2021.12.15.extension of time" History

- Document created by Laura Peters (laurap@nvbar.org) 2021-12-15 4:33:01 PM GMT- IP address: 71.94.199.108
- Document emailed to Gerard Gosioco (gerardg@nvbar.org) for signature 2021-12-15 4:34:41 PM GMT
- Email viewed by Gerard Gosioco (gerardg@nvbar.org)
  2021-12-15 4:38:00 PM GMT- IP address: 3.101.152.15
- Document e-signed by Gerard Gosioco (gerardg@nvbar.org)
   Signature Date: 2021-12-15 4:39:04 PM GMT Time Source: server- IP address: 174.72.164.15
- Agreement completed. 2021-12-15 - 4;39:04 PM GMT

