

IN THE SUPREME COURT OF THE STATE OF NEVADA

Desmon Brandes,

Appellant,

vs.

**Lacey Pictum, n/k/a Lacey
Krynzel,**

Respondent.

Electronically Filed
Oct 28 2021 11:11 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

Supreme Ct Case No. **83399**

District Ct Case No. **D-10-440022-C**

SECOND MOTION FOR EXTENSION OF TIME TO FILE
APPELLANT'S FAST TRACK STATEMENT AND APPELLANT'S
APPENDIX

COMES NOW Appellant, **Desmon Brandes**, by and through his attorneys of record, **Jack W. Fleeman, Esq.** and **Bruce I. Shapiro, Esq.**, of PECOS LAW GROUP, and respectfully request that this court grant his Second Motion for Extension of Time to File his Fast Track Statement and Appellant's Appendix.

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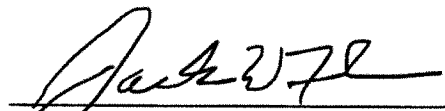
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This motion is made and based on the papers and pleadings on file herein and the points and authorities submitted herewith, and is made in good faith and not to delay justice.

DATED this 28th day of October, 2021.

PECOS LAW GROUP



Jack W. Fleeman, Esq.

Nevada Bar No. 010584

Bruce I. Shapiro, Esq.

Nevada Bar No. 004050

PECOS LAW GROUP

8925 South Pecos Road, Suite 14A

Henderson, Nevada 89074

(702) 388-1851

Attorneys for Appellant

MEMORANDUM OF POINTS AND AUTHORITIES

Nevada Rule of Appellate Procedure, Rule 26(b)(1)(A) states:

For good cause, the court may extend the time prescribed by these Rules, or by its order to perform any act, or may permit an act to be done after that time expires. But the court may not extend the time to file a notice of appeal except as provided in Rule 4(c).

Appellant's Fast Track Statement and Appellant's Appendix was due on October 4, 2021. Appellant previously requested a 30 day extension to file Appellant's Fast Track Statement and Appellant's Appendix because the

undersigned counsel had not yet received the transcripts that were ordered on August 31, 2021. Appellant is respectfully requesting an additional 14 day extension up to and including November 17, 2021 to file his Fast Track Statement and Appellant's Appendix. Appellant's counsel has been ill with Covid 19. This is the second and last continuance that will be requested by the Appellant, and no party will suffer prejudice from the granting of this motion.

DATED this 28th day of October, 2021.

PECOS LAW GROUP

A handwritten signature in black ink, appearing to read "Jack W. Fleeman", is written over a horizontal line.

Jack W. Fleeman, Esq.

Nevada Bar No. 010584

Bruce I. Shapiro, Esq.

Nevada Bar No. 004050

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Attorneys for Appellant

AFFIDAVIT OF JACK W. FLEEMAN, ESQ.

STATE OF NEVADA)
 : ss.
COUNTY OF CLARK)

JACK W. FLEEMAN, ESQ., first being duly sworn, deposes and says:

1. He is an attorney licensed to practice in the State of Nevada and attorney for Appellant in the above-referenced action; that by virtue of that fact, he has personal knowledge of the matters contained herein and is competent to testify to the same;

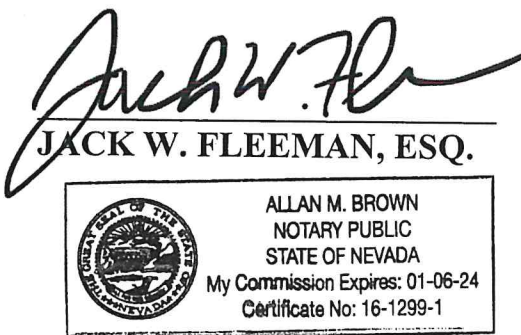
2. Affiant makes this affidavit in support of the foregoing "Second Motion for Extension of Time to File Appellant's Fast Track Statement and Appellant's Appendix;"

3. Affiant has read the foregoing Motion and hereby certifies that the facts set forth in the Points and Authorities attached thereto are true according to the record herein, and Affiant believes them to be true. Affiant incorporates these facts into this Affidavit as though fully set forth herein;

4. Affiant further attests that this motion is made in good faith and not to delay justice.

SUBSCRIBED and SWORN to before
me this 28th day of October, 2021.

Alan Brown
NOTARY PUBLIC



CERTIFICATE OF MAILING

I hereby certify that the foregoing “Second Moton for Extension of Time to File Appellant’s Fast Track Statement and Appellant’s Appendix” in the above-captioned matter was served this date by mailing a true and correct copy via first class mail, postage prepaid and addressed as follows:

Lacey Krynzel
6530 Annie Oakley #814
Henderson, Nevada 89014

DATED this 28th day of October 2021.



Janine Shapiro
an Employee of Pecos Law Group