



1 **MEMORANDUM**

2 I, JEAN J. SCHWARTZER, ESQ., am the attorney in the above-captioned  
3 case. Pursuant to NRAP 31(b)(3)(B), this Court may grant a fifth  
4 motion for extension of time for filing a brief upon a showing of  
5 extreme need. This is Appellant's sixth request for an extension of time.  
6 This request and the previous three requests total ten (10) days.  
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9 Appellant's Opening Brief is due today, September 1, 2021 and it is  
10 complete with the exception of entering some of the citations to the appendix. With  
11 respect to extreme need, Counsel for Appellant has had great difficulty merging the  
12 direct appeal appendix and with the new post-conviction appendix to create one  
13 continuous document. Although the appendices are now merged, counsel needs  
14 additional time to enter the citations to the post-conviction portion of the appendix  
15 into the brief. Therefore, Appellant moves for another small enlargement of  
16 time of one (1) day through September 1, 2021 to enter in the citations to the brief.  
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1 This Motion is made in good faith and not for the purposes of undue  
2 delay. I declare under penalty of perjury the factual representations set forth  
3 in the foregoing memorandum are true and correct.  
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10 DATED this 1<sup>st</sup> day of September, 2021.  
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12  
13 /s/ Jean Schwartzer  
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1 **CERTIFICATE OF SERVICE**

2 I HEREBY CERTIFY AND AFFIRM that this document was filed  
3 electronically foregoing document shall be made in accordance with the Master  
4 Service List as follows:  
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6  
7 AARON FORD, ESQ

8 ALEXANDER G. CHEN, ESQ.  
9

10  
11 BY: /s/ Jean Schwartzer  
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