

IN THE SUPREME COURT OF THE STATE OF NEVADA

Desmon Brandes,

Appellant,

vs.

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

Respondent.

Electronically Filed
Sep 30 2021 04:38 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Supreme Ct Case No. **83399**

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

**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, **Bruce I. Shapiro, Esq.** and **Jack W. Fleeman, Esq.**, of PECOS LAW
GROUP, and respectfully request that this court grant his Motion for Extension of
Time to File his Fast Track Statement and Appellant's Appendix.

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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 30th day of September, 2021.

PECOS LAW GROUP



Bruce I. Shapiro, Esq.

Nevada Bar No. 004050

Jack W. Fleeman, Esq.

Nevada Bar No. 010584

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 is currently due on October 4, 2021. Because the undersigned counsel has not yet received the transcripts that were ordered on August 31, 2021, counsel will require sufficient

time to review the transcripts and prepare Appellant's Fast Track Statement and Appellant's Appendix. Appellant, therefore, respectfully request a 30 day extension up to and including November 3, 2021 to file his Fast Track Statement and Appellant's Appendix. This is the first continuance, written or telephonic, requested by the Appellant, and no party will suffer prejudice from the granting of this motion.

DATED this 30th day of September, 2021.

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Bruce I. Shapiro, Esq.

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Attorneys for Appellant

AFFIDAVIT OF BRUCE I. SHAPIRO, ESQ.

STATE OF NEVADA)
 : ss.
COUNTY OF CLARK)

BRUCE I. SHAPIRO, 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 “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.

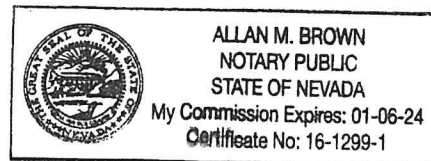


BRUCE I. SHAPIRO, ESQ.

SUBSCRIBED and SWORN to before
me this 30th day of September, 2021.



NOTARY PUBLIC

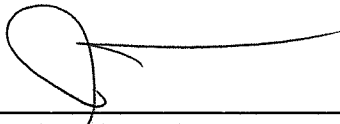


CERTIFICATE OF MAILING

I hereby certify that the foregoing “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 30th day of September 2021.



Janine Shapiro
an Employee of Pecos Law Group