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RENEE BAKER, WARDEN,
Lovelock Correctional Center

Supreme Court Case No.: 2022-01-10 p.m.
District Court Case No.: C268285-1

COMES NOW Appellant, GUILLERMO RENTERIA-NOVOA, by and through his counsel in this matter, JEAN J. SCHWARTZER, ESQ., and moves this Court for the first time for an enlargement of fifteen (15) days from September 1, 2022 to file Appellant's Opening Brief, making said brief due September 16, 2022. This motion is based upon the following memorandum and all papers and pleadings on file herein.

Dated this 1st day of September, 2022.

Respectfully submitted,

/s/ Jean J. Schwartz
JEAN J. SCHWARTZER, ESQ.
 Law Office of Jean J. Schwartz
 411 E. Bonneville Avenue Suite360
 Las Vegas, NV 89101
 Phone: 702-979-9941
 jean.schwartz@ gmail.com
 Counsel for Appellant

1 **MEMORANDUM**

2 I, JEAN J. SCHWARTZER, ESQ., am the attorney in the above-captioned case.
3 Appellant's Opening Brief is due on September 1, 2022. Pursuant to NRAP
4 31(b)(3)(B), this Court grant a first motion for extension of time for filing an Opening
5 Brief upon a showing of good cause. This is Appellant's first request for an extension
6 of time to file his Opening Brief.

7 With respect to good cause, counsel for appellant had surgery in late July and
8 was unable to work for a few weeks. Prior to having surgery she was sick with strep
9 throat and covid simultaneously. As a result she is behind in completing the Opening
10 Brief. Therefore, Appellant requests fifteen (15) additional days to file his Opening
11 Brief.

12 This Motion is made in good faith and not for the purposes of undue delay.

13 I declare under penalty of perjury the factual representations set forth in the
14 foregoing memorandum are true and correct.

15 Dated this 1st day of September, 2022.

16
17 Respectfully submitted,

18 /s/ Jean J. Schwartzer
19 JEAN J. SCHWARTZER, ESQ.
20 Law Office of Jean J. Schwartzer
21 411 E. Bonneville Avenue Suite 360
22 Las Vegas, NV 89101
23 Phone: 702-979-9941
24 jean.schwartzter@gmail.com
25 Counsel for Appellant
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY AND AFFIRM that this document was filed electronically with the Nevada Supreme Court on September 1st, 2022. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

AARON FORD, ESQ.
Nevada Attorney General

ALEXANDER G. CHEN, ESQ.
Chief Deputy District Attorney

/s/ Jean J. Schwartz
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