IN THE SUPREME COURT OF THE STATE OF NEVADA 1 2 3 **Electronically Filed** 4 GUILLERMO RENTERIA-NOVOA, Supreme Court Cost No 2022656:57 p.m. Elizabeth A. Brown 5 District Court Caselly of Suppose Court Appellant, 6 7 VS. 8 RENEE BAKER, WARDEN, 9 Lovelock Correctional Center 10 11 12 MOTION FOR ENLARGEMENT OF TIME (Third Request) 13 14 COMES NOW Appellant, GUILLERMO RENTERIA-NOVOA, by and 15 through his counsel in this matter, JEAN J. SCHWARTZER, ESQ., and moves 16 this Court for the third time for an enlargement of one (1) day from October 3, 17 2022 to file Appellant's Opening Brief, making said brief due October 4, 18 2022. This motion is based upon the following memorandum and all papers 19 and pleadings on file herein. 20 Dated this 3rd day of October, 2022. 21 22 Respectfully submitted, 23 24 lean I. Sch<u>wartzer</u> 25 JEAN J. SCHWARTZER, ESQ. Law Office of Jean J. Schwartzer 411 E. Bonneville Avenue Suite360 26 Las Vegas, NV 89101 Phone: 702-979-9941 27 Counsel for Appellant 28

<u>MEMORANDUM</u>

I, JEAN J. SCHWARTZER, ESQ., am the attorney in the above-captioned case. Appellant's Opening Brief is due on October 3rd, 2022. Pursuant to NRAP 31(b)(3)(B), this Court grant a third motion for extension of time for filing an Opening Brief upon a showing of extreme need. This is Appellant's third request for an extension of time to file his Opening Brief. His first request was for fifteen (15) days, the second extension was for fifteen (15) days, and the instant is for only one (1) day, totaling only thirty (31) days of extensions.

With respect to the previous two requests, counsel was dealing with health issues and medical treatment and needed additional time to complete the brief.

With respect to extreme need for the instant request, counsel did not account for the Jewish holidays when making the most recent request and had less time to work than anticipated. The brief is complete and will be filed this evening along with the Appendix.

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

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

Dated this 3rd day of October, 2022.

Respectfully submitted,

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

CERTIFICATE OF SERVICE I HEREBY CERTIFY AND AFFIRM that this document was filed electronically with the Nevada Supreme Court on October 3rd, 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. Schwartzer JEAN J. SCHWARTZER, ESQ. Law Office of Jean J. Schwartzer 411 E. Bonneville Avenue Suite360 Las Vegas, NV 89101 Phone: 702-979-9941 jean.schwartzer@gmail.com Counsel for Appellant