## IN THE SUPREME COURT OF THE STATE OF NEVADA

1 2 3 Electronically Filed 4 GUILLERMO RENTERIA-NOVOA, Supreme Court @ 10.2626562:00 AM Elizabeth A. Brown 5 District Court Casel of Supreme Court Appellant, 6 7 VS. 8 RENEE BAKER, WARDEN, 9 Lovelock Correctional Center 10 11 12 **MOTION FOR ENLARGEMENT OF TIME** (First Request) 13 14 COMES NOW Appellant, GUILLERMO RENTERIA-NOVOA, by and 15 through his counsel in this matter, JEAN J. SCHWARTZER, ESQ., and moves this 16 Court for the first time for an enlargement of fifteen (15) days from December 2, 2022 17 to file Appellant's Reply Brief, making said brief due December 17, 2022. This 18 motion is based upon the following memorandum and all papers and pleadings on file 19 herein. 20 Dated this 2<sup>nd</sup> day of December, 2022. 21 22 Respectfully submitted, 23 /s/ Jean J. Schwartzer 24 JEAN J. SCHWARTZER, ESQ. Law Office of Jean J. Schwartzer 25 411 E. Bonneville Avenue Suite360 Las Vegas, NV 89101 26 Phone: 702-979-9941 jean.schwartzer@gmail.com 27 Counsel for Appellant 28

## **MEMORANDUM** 1 I, JEAN J. SCHWARTZER, ESQ., am the attorney in the above-captioned case. 2 3 Appellant's Opening Brief is due on December 2, 2022. Pursuant to NRAP 4 31(b)(3)(B), this Court grant a first motion for extension of time for filing an Reply 5 Brief upon a showing of good cause. This is Appellant's first request for an extension 6 of time to file his Reply Brief. With respect to good cause, counsel for Appellant was recently out of the 8 jurisdiction for ten (10) days and shortly after her return did not work during her 9 children's Thanksgiving break from school. Therefore, Appellant requests fifteen (15) 10 additional days to file his Reply Brief. 11 This Motion is made in good faith and not for the purposes of undue delay. 12 I declare under penalty of perjury the factual representations set forth in the 13 foregoing memorandum are true and correct. Dated this 2<sup>nd</sup> day of December, 2022. 14 15 Respectfully submitted, 16 /s/ Jean J. Schwartzer 17 JEAN J. SCHWARTZER, ESQ. Law Office of Jean J. Schwartzer 411 E. Bonneville Avenue Suite360 18 Las Vegas, NV 89101 19 Phone: 702-979-9941 jean.schwartzer@gmail.com 20 Counsel for Appellant 21 22 23 24 25

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1 2	CERTIFICATE OF SERVICE
3	I HEREBY CERTIFY AND AFFIRM that this document was filed
4	electronically with the Nevada Supreme Court on December 2 <sup>nd</sup> , 2022. Electronic
5	Service of the foregoing document shall be made in accordance with the Master
6	Service List as follows:
7	
8	AARON FORD, ESQ. Nevada Attorney General
9	ALEXANDER G. CHEN, ESQ. Chief Deputy District Attorney
10	Chief Deputy District Attorney
11	
12	/s/ Jean J. Schwartzer
13	/s/ Jean J. Schwartzer JEAN J. SCHWARTZER, ESQ. Law Office of Jean J. Schwartzer
<ul><li>14</li><li>15</li></ul>	411 E. Bonneville Avenue Suite360 Las Vegas, NV 89101 Phone: 702-979-9941
16	jean.schwartzer@gmail.com Counsel for Appellant
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