

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

IN RE: DISCIPLINE OF THOMAS S. Case No.: 84846  
SHADDIX, ESQ.  
NEVADA BAR NO. 7905

Electronically Filed  
JUL 10 2022 10:16:15 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court  
**RESPONDENT'S MOTION FOR**  
**EXTENSION OF TIME**  
**PURSUANT TO N.R.A.P. 31(b)(3)**

Respondent in Proper Person THOMAS S. SHADDIX hereby respectfully files his RESPONDENT'S MOTION FOR EXTENSION OF TIME PURSUANT TO N.R.A.P. 31(b)(3) with this Honorable Court. This Motion is based upon the papers and pleadings on file herein, the Declaration of Thomas S. Shaddix, Esq. pursuant to 28 U.S.C. 1746 attached hereto and such other supplemental argument as may be submitted or the Court may require.

**I. THE RELIEF SOUGHT**

Respondent in Proper Person respectfully requests that this Honorable Court grant him an extension of time of **fourteen (14) days** in which to file his Opening Brief in this matter.

**II. MOTION**

Respondent in Proper Person was served with a Notice of Briefing Schedule/Bar Discipline via email on June 10, 2022. The Notice of Briefing Schedule/Bar Discipline specifically stated that "[a]ny opening brief must be filed within filed within 30 days from the date of this notice."

Respondent in Proper Person did, on June 10, 2022, and does now, intend to file an Opening Brief in this matter. However, for reasons as set forth below, Respondent in Proper Person is in need of additional time in which to properly prepare his Brief.

N.R.A.P. 31(b)(3) states in pertinent part as follows:

(3) Motions for Extensions of Time. A motion for extension of time for filing a brief may be made no later than the due date for the brief and must comply with the provisions of this Rule and Rule 27.

(A) Contents of Motion. A motion for extension of time for filing a brief shall include the following:

- (I) The date when the brief is due;
- (ii) The number of extensions of time previously granted (including a 14-day telephonic extension), and if extensions were granted, the original date when the brief was due;
- (iii) Whether any previous requests for extensions of time have been denied or denied in part;
- (iv) The reasons or grounds why an extension is necessary (including demonstrating extraordinary and compelling circumstances under Rule 26(b)(1)(B), if required); and
- (v) The length of the extension requested and the date on which the brief would become due.

Respondent in Proper Person affirmatively states the following:

- (i) The date when the brief is due is July 11, 2022. Accordingly, this Motion is being filed before the expiration of time in which to file an Opening Brief, which expires on July 11, 2022 pursuant to N.R.A.P. 26(a)(1)(C).
- (ii) The number of extensions of time previously granted (including a 14-day telephonic extension), and if extensions were granted, the original date when the brief was due is ZERO (0).
- (iii) Whether any previous requests for extensions of time have been denied or denied in part; No previous requests for extensions of time have been denied or denied in part.
- (iv) The reasons or grounds why an extension is necessary (including

demonstrating extraordinary and compelling circumstances under Rule 26(b)(1)(B), if required). Respondent in Proper Person has employed the services of a paralegal to assist him in the preparation of his Opening Brief in this matter. This individual had traveled out of state last week on other business and had planned to finalize Respondent's Opening Brief upon return. While out of state, this individual contracted a serious respiratory illness consistent with Covid-19, although that diagnosis has not been formally confirmed as of this writing. Respondent in Proper Person is a sole practitioner, currently without the assistance of a secretary. The record on appeal is quite voluminous in nature as this matter has been ongoing for more than two (2) years, which Respondent in Proper Person is informed and believes is due at least in part to Covid-19 restrictions and delays. Respondent in Proper Person has every intention of meaningfully responding to this matter and seeking a hearing if possible, but simply needs the requested additional brief period of time in which to do so.

- (v) Respondent in Proper Person respectfully requests an additional fourteen (14) days in which to file an Opening Brief; if this Motion is granted, the Opening Brief would be due on Monday, July 25, 2022.

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### III. CONCLUSION

For the reasons set forth herein, Respondent in Proper Person respectfully requests that RESPONDENT'S MOTION FOR EXTENSION OF TIME PURSUANT TO N.R.A.P. 31 (b)(3) be granted in its entirety as set forth herein.

Dated this 11th day of July, 2022.

LAW OFFICE OF THOMAS S. SHADDIX

/s/ Thomas S. Shaddix

Thomas S. Shaddix, Esq.

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Respondent in Proper Person

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## **CERTIFICATE OF COMPLIANCE**

I hereby certify that this RESPONDENT’S MOTION FOR EXTENSION OF TIME PURSUANT TO N.R.A.P. 31(b)(3) complies with the formatting requirements of N.R.A.P. 32(a)(4), the typeface requirements of N.R.A.P. 32(a)(5) and the type style requirements of N.R.A.P. 32(a)(6). This Answer has been prepared in a proportionally spaced typeface using Microsoft Word in 14 point Times New Roman font, is 1,235 words, seven (7) pages, in length (N.R.A.P. 32(a)(7)).

I further certify that I have read this RESPONDENT’S MOTION FOR EXTENSION OF TIME PURSUANT TO N.R.A.P. 31(b)(3), and to the best of my knowledge, information and belief, it is not frivolous or interposed for any improper purpose. I further certify that this RESPONDENT’S MOTION FOR EXTENSION OF TIME PURSUANT TO N.R.A.P. 31(b)(3) complies with all applicable Nevada Rules of Appellate Procedure. I understand that I may be subject to sanctions in the event that this appellate pleading is not in conformity with the requirements of the Nevada Rules of Appellate Procedure.

DATED this 11th day of July, 2022.

LAW OFFICE OF THOMAS S. SHADDIX

/s/ Thomas S. Shaddix

Thomas S. Shaddix, Esq.

Nevada State Bar No.: 7905

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**DECLARATION OF THOMAS S. SHADDIX, ESQ., RESPONDENT,**  
**PURSUANT TO 28 U.S.C. 1746 IN SUPPORT OF RESPONDENT'S**  
**MOTION FOR EXTENSION OF TIME PURSUANT TO N.R.A.P. 31 (b)(3)**

That I have read the foregoing RESPONDENT'S MOTION FOR EXTENSION OF TIME PURSUANT TO N.R.A.P. 31(b)(3) ; I am the Respondent in the above-captioned matter and am competent to testify to the matters stated herein. I hereby incorporate by reference the entirety of the Motion set forth above, and everything contained therein is true and correct to the best of my knowledge, except for those matters stated upon information and belief, and as to those matters, I believe the same are true.

Executed at Las Vegas, Nevada, this 11th day of July, 2022, under penalty of perjury pursuant to 28 U.S.C. 1746.

/s/ Thomas S. Shaddix  
THOMAS S. SHADDIX

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 11, 2022, I caused a true and correct copy of the foregoing RESPONDENT’S MOTION FOR EXTENSION OF TIME PURSUANT TO N.R.A.P. 31(b)(3) to be electronically served upon the following person(s) through the Supreme Court’s eflex service system:

BRUCE C. HAHN, ESQ.

Nevada State Bar No. 5011

State Bar of Nevada

3100 W. Charleston Blvd., Ste. 100

Las Vegas, NV 89102

Counsel for the State Bar of Nevada

/s/ Thomas S. Shaddix

LAW OFFICE OF THOMAS S. SHADDIX