

IN THE SUPREME COURT OF THE STATE OF NEVADA

YVES GHIAI-CHAMLOU,
Plaintiff,

vs.

RELIANT TITLE USA, LLC;
HORIZON REALTY GROUP, LLC;
BERKSHIRE HATHAWAY
HOMESERVICES NEVADA; DOES
I through XXX, inclusive, and ROE
BUSINESS ENTITIES I through X,
inclusive,

Defendants.

No. 83635

Electronically Filed
Nov 12 2021 01:00 p.m.

**MOTION FOR EXTENSION OF
TIME TO FILE DOCKETING
STATEMENT
CIVIL APPEALS**

*Appeal from Eight Judicial District
Court Case No.: A-18-777196-C
Hon: Susan H. Johnson*

**MOTION FOR EXTENSION OF TIME
TO FILE DOCKETING STATEMENT
(First Request)**

Appellant hereby moves for a 30-day extension of time for filing the Docketing Statement in this matter. The Docketing Statement is presently due for filing on November 15, 2021. Therefore, appellant requests an extension until December 15, 2021.

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This Motion is brought pursuant to NRAP 26(b)(1)(A) on the grounds that good cause exists to enlarge the time to file the Docketing Statement and is based on this motion, the attached Memorandum of Points and Authorities and Declaration of Leo P. Flangas, Esq., the papers and pleadings on file and on such other oral or documentary evidence that may be subsequently presented.

DATED: November 11, 2021.

/s/ Leo P. Flangas
LEO P. FLANGAS, Esq.
Nevada Bar No.: 5637
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600 S. Third Street
Las Vegas, NV 89101
Attorney for Appellant

MEMORANDUM OF POINTS AND AUTHORITIES

I.

GOOD CAUSE EXISTS TO ENLARGE TIME TO FILE THE DOCKETING STATEMENT

NRAP 26(b)(1)(A) provides in relevant part:

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.....

Mr. Flangas respectfully requests the Court to grant an extension of time to file the Docketing Statement. Mr. Flangas has had a heavy trial schedule and did not have assistance in preparing the Docketing Statement. Therefore, these other matters took precedence and hindered our ability to timely file the docketing statement. Although the undersigned has been working to draft the Docketing Statement, Appellant's attorney will be unable to complete it by the current deadline.

CONCLUSION

Accordingly, due to the foregoing, Appellant respectfully submits that good cause exists for this Court to grant an additional 30 days to file the Docketing Statement. If granted, the new due date would be December 15, 2021. This request is being made in good faith, without the intent to delay this appeal unnecessarily.

Dated this 12TH day of November 2021.

/s/ Leo P. Flangas
LEO P. FLANGAS, Esq.
Nevada Bar No.: 5637
Telephone: (702) 384-1990
Fax: (702) 384-1009
600 S. Third Street
Las Vegas, NV 89101
Attorney for Appellant

DECLARATION OF LEO P. FLANGAS

I, LEO P. FLANGAS, declare as follows:

1. I am attorney licensed to practice before all the courts of the State of Nevada. All of the fact set forth here are true of my own personal knowledge. If called to testify I could, and would, testify as to them.
2. I represent the Appellants in the above referenced case.
3. I have had a heavy trial schedule and did not have assistance to date in preparing the docketing statement.
4. This is my First Request for an extension of time to file the Docketing Statement.

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Executed this 12th Day of November 2021 at Las Vegas, Nevada.

/s/ Leo P. Flangas
LEO P. FLANGAS, Esq.

CERTIFICATE OF SERVICE

I certify that on this date I electronically filed the foregoing document with the Clerk of the Nevada Supreme Court, and therefore electronic service was made in accordance with the master service list and includes, but is not limited to the following:

Jay Kenyon, Esq.
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J. Daniel Weidner, ESQ. (*pro hoc vice*)
402-390-9500
KOLEY JESSEN, P.C., L.L.O.
1125 South 103rd St., Suite 800
Omaha, NE 68124

Attorneys for Reliant Title USA, LLC

DATED: November 12, 2021

/s/Natasha Smith
For the firm