

SUB
T. AUGUSTUS CLAUS, ESQ.
Legal Resource Group, LLC.
Nevada Bar No. 10004
205 N. Stephanie St., Suite D221
Henderson, NV 89074
Telephone: (702) 463-4900
Fax: (702) 463-4800
Attorney for Appellant

RECEIVED
LAS VEGAS DROP BOX
CLERK OF SUPREME COURT
2020 MAR -9 PM 12: 05

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

FILED

MAR 12 2020

KEENAN WATKINS,
Appellant,

vs.

THE STATE OF NEVADA,
Respondent.

Supreme Court No.: 79719
District Court No.: C308582
Dept. No.: 20

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
BY *E. Richards*
DEPUTY CLERK

MOTION TO EXTEND TIME TO FILE OPENING BRIEF

COMES NOW, Appellant, KEENAN WATKINS, by and through his attorney, T. AUGUSTUS CLAUS, ESQ. of the law firm of Legal Resource Group, LLC., and moves this Honorable Court to grant a one hundred and twenty (120) day extension of time to file Appellant's Opening Brief. This Motion is based upon the following Memorandum of Points and Authorities.

DATED this 5th day of March, 2020.

RECEIVED
MAR 11 2020
ELIZABETH A. BROWN
CLERK OF SUPREME COURT
DEPUTY CLERK

[Signature]
T. AUGUSTUS CLAUS, ESQ.
Legal Resource Group, LLC.
Nevada Bar No. 10004
205 N. Stephanie St., Suite D221
Henderson, NV 89074

20-09873

MEMORANDUM OF POINTS AND AUTHORITIES

Appellant's Counsel was retained on February 18th, 2020 by Appellant to file his Opening Brief. Appellant's counsel received the transcripts from prior counsel on February 27th, 2020. Therefore, Appellant's counsel needs more time to review the transcripts and file the Opening Brief. This is the first extension of time requested by the Appellant.

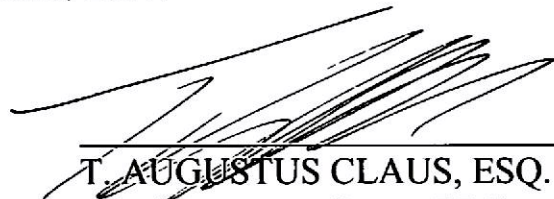
NRAP 26 governs computing and extending time, and reads, in pertinent part:

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.

NRAP 26 (b)(1)(A).

Appellant can demonstrate good cause, as described above. THEREFORE, Appellant's Counsel would request a 120 day extension to file the Opening Brief.

DATED this 5th day of March, 2020.



T. AUGUSTUS CLAUS, ESQ.
Legal Resource Group, LLC.
Nevada Bar No. 10004
205 N. Stephanie St., Suite D221
Henderson, NV 89074

CERTIFICATE OF SERVICE

Pursuant to NRAP 4(b) and NRAP 25(d)(1)(B), I hereby certify that I am employed by the **LEGAL RESOURCE GROUP, LLC.**, and that on the 5th day of March, 2020, I caused the MOTION TO EXTEND TIME TO FILE OPENING BRIEF to be served as follows:

- [X] by placing a true and correct copy of the same to be deposited for mailing in the U.S. Mail at Las Vegas, Nevada, enclosed in a sealed envelope upon which first class postage was fully prepaid; and/or
- [] pursuant to EDCR 7.26, by sending it via facsimile; and/or
- [] by hand delivery via runner
- [] via electronic service

to the attorneys listed below:

DISTRICT ATTORNEY'S OFFICE
Clark County District Attorney
200 South Lewis Avenue
Las Vegas, Nevada 89155
pdmotions@clarkcountyda.com


Employed by the Legal Resource Group, LLC.