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**MOT**  
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Attorney for Appellant

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

**FILED**

**JUN 26 2020**

ELIZABETH A. BROWN  
CLERK OF SUPREME COURT  
BY S. Younky  
DEPUTY CLERK

KEENAN WATKINS,  
  
Appellant,  
  
vs.  
  
THE STATE OF NEVADA,  
  
Respondent.

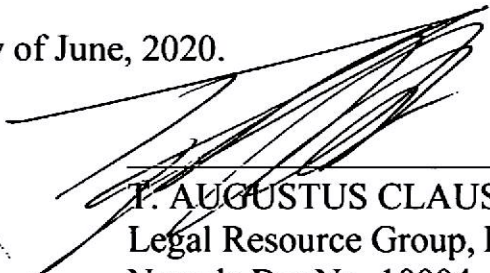
Supreme Court No.: 79719  
District Court No.: C308582  
Dept. No.: 20

**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 ninety (90) day extension of time to file Appellant's Opening Brief. This Motion is based upon the following Memorandum of Points and Authorities.

DATED this 23<sup>rd</sup> day of June, 2020.

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JUN 25 2020  
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Henderson, NV 89074

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**MEMORANDUM OF POINTS AND AUTHORITIES**

Appellant's Counsel received the transcripts from prior counsel. There are 1400 pages of transcripts and given the Covid Restrictions, Appellant's counsel needs more time to review the transcripts and file the Opening Brief.

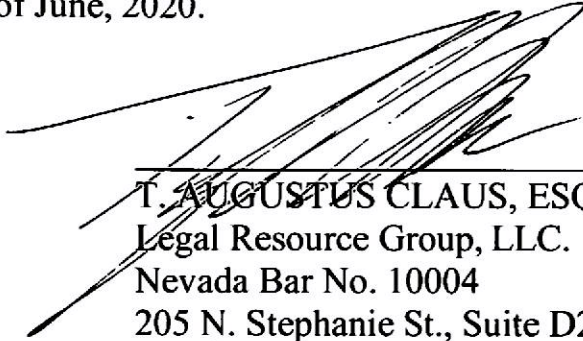
NRAP 26 governs computing and extending time, and reads, in pertinent part:

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 90 day extension to file the Opening Brief.

DATED this 23<sup>rd</sup> day of June, 2020.



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T. AUGUSTUS CLAUS, ESQ.  
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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 23<sup>rd</sup> day of June, 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  
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Las Vegas, Nevada 89155  
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Employed by the Legal Resource Group, LLC.