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IN THE SUPREME COURT OF THE  
STATE OF NEVADA

FILED

OCT 29 2020

ELIZABETH A. BROWN  
CLERK OF SUPREME COURT  
BY *D. Richards*  
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 Ten (10) day extension of time to file Appellant's Opening Brief. This Motion is based upon the following Memorandum of Points and Authorities.

DATED this 21<sup>st</sup> day of October, 2020.

*mr* # 4742

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**MEMORANDUM OF POINTS AND AUTHORITIES**

Appellant's Counsel was required to leave the jurisdiction to retrieve an electronic device to be delivered to the Clark County Detention Center or to the Court on a separate client matter. Prior to delivery, Appellant's Counsel first must prep the computer to be delivered requiring work with an out of state computer tech before the next court date. Additionally, counsel is expecting to announce ready for an invoked client for trial. Therefore, Appellant's counsel Appellant's counsel requests ten (10) days to Finalize 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 demonstrated extraordinary circumstances, as described above. THEREFORE, Appellant's Counsel would request a 10 day extension to file the Opening Brief.

DATED this 21<sup>st</sup> day of October, 2020.

# 4742



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**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 21<sup>st</sup> day of October, 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:

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Clark County District Attorney  
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Employed by the Legal Resource Group, LLC.