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

3  
4 CLEMON HUDSON,  
5 Appellant,  
6 vs.  
7 STATE OF NEVADA,  
8 Respondent.

Electronically Filed  
Case No. 82231 Jul 14 2021 08:12 a.m.  
Elizabeth A. Brown  
Supreme Court  
**APPELLANT'S MOTION  
FOR EXTENSION OF TIME  
TO FILE OPENING BRIEF  
AND APPENDIX (2nd Request)**

9  
10 COMES NOW, Christopher R. Oram, Esq., attorney for Appellant

11 CLEMON HUDSON, and moves this Court for an Order granting an extension of  
12 time of sixty (60) days from the date the Opening Brief and Appendix are now due,  
13 to wit: July 15, 2021, and to extend the time up to and including September 13,  
14 2021, for the filing of the Opening Brief and Appendix. This motion is made and  
15 based upon NRAP 27 and 31(a), the Affidavit of Christopher R. Oram, Esq., filed  
16 herewith, and the Points and Authorities attached hereto.  
17

18  
19 DATED this 14th day of July, 2021.

20  
21 Respectfully submitted,

22 By: /s/ Christopher R. Oram  
23 Christopher R. Oram, Esq.  
24 Nevada Bar No. 4349  
25 Rachael E. Stewart, Esq.  
26 Nevada Bar No. 14122  
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1 MEMORANDUM OF POINTS AND AUTHORITIES

2 ARGUMENT

3  
4 *Good Cause Exists to Enlarge the Time to File Appellant’s Opening Brief and*  
5 *Appendix*

6 Nevada Rules of Appellate Procedure (NRAP) Rule 31(a) provides that an  
7 appellant shall serve and file an opening brief within one hundred and twenty (120)  
8 days after the appeal is docketed in the Nevada Supreme Court.  
9

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

11 For good cause, the court may extend the time prescribed by  
12 these Rules or by its order to perform any act, or may permit an  
13 act to be done after that time expires.

14 Additionally, NRAP 31(b)(3) provides in relevant part:

15  
16 **Motions for Extensions of Time.** A motion for extension  
17 of time for filing a brief may be made no later than the due date  
18 for the brief and must comply with the provisions of this Rule  
and Rule 27.

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

- 21 (i) The date when the brief is due;
- 22 (ii) The number of extensions of time previously  
23 granted (including a 14-day telephonic extension), and if  
24 extensions were granted, the original date when the brief was  
due;
- 25 (iii) Whether any previous requests for extensions of  
26 time have been denied or denied in part;
- 27 (iv) The reasons or grounds why an extension is  
28 necessary; and
- (v) The length of the extension requested and the date  
on which the brief would become due.

1           The Appellant’s Opening Brief and Appendix are currently due on July 15,  
2 2021. One previous extension has been requested and granted. No extensions have  
3 been denied.  
4

5           Good cause exists to extend the time to file the Opening Brief and Appendix  
6 in this case. The instant case involves multiple claims both on direct appeal from  
7 the judgment of conviction and on appeal from the denial of Appellant’s post-  
8 conviction claims.  
9

10           Counsel has been diligently working on the Opening Brief and Appendix.  
11 Throughout the research, additional issues have arisen that must be thoroughly  
12 vetted and researched before finalizing the appeal. Counsel requests that the Court  
13 grant this extension to allow Counsel the time to address Appellant’s issues  
14 effectively.  
15  
16

17           Appellant is currently serving a lengthy sentence. It is necessary that  
18 Counsel and Appellant have enough time to address all of the issues before filing  
19 the Opening Brief and Appendix. Therefore, good cause exists for this Court to  
20 extend the time to file the Appellant’s Opening Brief and Appendix by sixty (60)  
21 days.  
22

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25 ///

1 **CONCLUSION**

2 Based on the foregoing, good cause exists to enlarge the time to file the  
3 Opening Brief and Appendix. Counsel respectfully requests that this Court grant  
4 the requested extension to file the Opening Brief and Appendix by September 13,  
5 2021.  
6

7  
8 DATED July 14, 2021.

9 Respectfully submitted,

10 By:           /s/ Christopher R. Oram            
11 Christopher R. Oram, Esq.  
12 Nevada Bar No. 4349  
13 Rachael E. Stewart, Esq.  
14 Nevada Bar No. 14122  
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1                   **AFFIDAVIT OF CHRISTOPHER R. ORAM IN SUPPORT OF**  
2                   **APPELLANT’S MOTION FOR EXTENSION OF TIME TO FILE**  
3                   **OPENING BRIEF AND APPENDIX**

4 COUNTY OF CLARK    )  
5 STATE OF NEVADA    ) ss:

6           Affiant, CHRISTOPHER R. ORAM, ESQ., being duly sworn, deposes, and  
7 states as follows:

- 8
- 9           1. I am an attorney duly licensed to practice law in the State of Nevada. I am  
10           counsel for the Appellant in the above-entitled matter. I have personal  
11           knowledge of all matters contained herein and am competent to testify  
12           thereto.
- 13
- 14           2. Appellant Hudson’s Opening Brief and Appendix are currently due on July  
15           15, 2021. This is the second request for an extension of time. The instant  
16           case involves both a direct appeal from the judgment of conviction and a  
17           post-conviction appeal involving many serious felony convictions.
- 18
- 19           3. It is imperative that Counsel has adequate time to research and develop  
20           Appellant’s issues effectively.
- 21
- 22           4. Counsel respectfully requests that this Court grant this extension and permit  
23           Counsel to file the Opening Brief and Appendix by September 13, 2021.
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- 25           5. That this motion is made in good faith and not for the purposes of delay.
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6. That I affirm under the penalty of perjury, the foregoing is true and correct.

FURTHER YOUR AFFIANT SAYETH NAUGHT

DATED this 14th day of July, 2021.

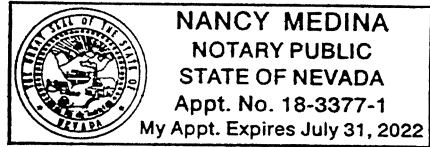


CHRISTOPHER R. ORAM, ESQ.

SUBSCRIBED AND SWORN TO before me  
this 14th day of July, 2021.



NOTARY PUBLIC in and for said  
County and State



1 **CERTIFICATE OF SERVICE**

2 I hereby certify and affirm that this document was filed electronically with  
3 the Nevada Supreme Court on July 14, 2021. Electronic Service of the foregoing  
4 document shall be made in accordance with the Master Service List as follows:  
5

6  
7 AARON FORD  
8 Nevada Attorney General

9 STEVEN B. WOLFSON  
10 Clark County District Attorney

11 CHRISTOPHER R. ORAM  
12 Counsel for Appellant

13 By:           /s/ Nancy Medina            
14 Law Offices of Christopher R. Oram  
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