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

3
4 TOYER EDWARDS,
5 Appellant,
6 vs.
7 STATE OF NEVADA,
8 Respondent.

Electronically Filed
Case No. 82639 Apr 07 2022 10:21 p.m.
Elizabeth A. Brown
APPELLANT'S MOTION
FOR EXTENSION OF TIME
TO FILE REPLY BRIEF (1st
Request)

9
10 COMES NOW, Christopher R. Oram, Esq., attorney for Appellant TOYER
11 EDWARDS, and moves this Court for an Order granting an extension of time of
12 twenty-one (21) days from the date the Reply Brief is now due, to wit: April 7,
13 2022, and to extend the time up to and including April 28, 2022, for the filing of
14 the Reply Brief. This motion is made and based upon NRAP 27 and 31(a), and the
15 Points and Authorities attached hereto.
16

17
18 DATED this 7th day of April, 2022.

19 Respectfully submitted,

20 By: /s/ Christopher R. Oram
21 Christopher R. Oram, Esq.
22 Nevada Bar No. 4349
23 Rachael E. Stewart, Esq.
24 Nevada Bar No. 14122

1 MEMORANDUM OF POINTS AND AUTHORITIES

2 ARGUMENT

3
4 *Good Cause Exists to Enlarge the Time to File Appellant’s Reply Brief*

5 Nevada Rules of Appellate Procedure (NRAP) Rule 31(a) provides that an
6 appellant shall serve and file a reply brief within thirty (30) days after respondent’s
7 brief is served.
8

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

10
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 **Motions for Extensions of Time.** A motion for extension
16 of time for filing a brief may be made no later than the due date
17 for the brief and must comply with the provisions of this Rule
18 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
25 due;
- 26 (iii) Whether any previous requests for extensions of
27 time have been denied or denied in part;
- 28 (iv) The reasons or grounds why an extension is
necessary; and
- (v) The length of the extension requested and the date
on which the brief would become due.

1 The Appellant’s Reply Brief is currently due on April 7, 2022. No previous
2 extensions have been requested.
3

4 Good cause exists to extend the time to file the Reply Brief in this case.
5 Counsel has been diligently working on the case. Counsel requests additional time
6 to finish researching and responding to the State’s arguments.
7

8 As Appellant received a sentence under the large habitual criminal statute,
9 this case requires extensive research to ensure that Mr. Edwards thoroughly
10 responds to all of the State’s arguments. Therefore, Counsel requests this
11 continuance to finalize the Reply Brief.
12

13 In sum, Counsel and Appellant request this additional time to address all of
14 the State’s arguments before filing the Reply Brief. Accordingly, good cause exists
15 for this Court to extend the time to file the Appellant’s Reply Brief by twenty-one
16 (21) days.
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1 **CONCLUSION**

2 Based on the foregoing, good cause exists to enlarge the time to file the
3
4 Reply Brief. Counsel respectfully requests that this Court grant the requested
5 extension to file the Reply Brief by April 28, 2022.
6

7 DATED this 7th day of April, 2022

8 Respectfully submitted,

9 By: /s/ Christopher R. Oram

10 Christopher R. Oram, Esq.

11 Nevada Bar No. 4349

12 Rachael E. Stewart, Esq.

13 Nevada Bar No. 14122
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify and affirm that this document was filed electronically with
3 the Nevada Supreme Court on April 7, 2022. 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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