

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

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ANDREW YOUNG, )  
 )  
 Appellant, )  
 )  
 vs. )  
 )  
 THE STATE OF NEVADA, )  
 )  
 Respondent. )  
 )

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Electronically Filed  
Dec 16 2021 07:41 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court  
Case No. 83243

**APPELLANT’S MOTION FOR EXTENSION OF TIME**

Comes now Appellant, Andrew Young, by and through his counsel, Nancy M. Lemcke, and hereby moves this Honorable Court to extend the time for the filing of Appellant’s Opening Brief sixty (60) days from Friday, December 17, 2021 to and including Tuesday, February 15, 2022. This Motion is based upon the Declaration of Counsel attached hereto.

DATED this 16th day of December, 2021.

Nancy Lemcke Law, LLC.

By /s/ Nancy M. Lemcke  
NANCY M. LEMCKE, #5416  
Nancy Lemcke Law, LLC  
10161 Park Run Drive, Suite #150  
Las Vegas, NV 89145  
(702) 902-6691  
Nancy.Lemcke@LemckeLawLV.com

**DECLARATION OF NANCY M. LEMCKE**

1. I am an attorney licensed to practice law in the State of Nevada; I am handling the appeal of this matter; I am familiar with the procedural history of this case.

2. The Notice of Appeal was filed by David Fischer, Esq., on July 15, 2021.

3. Approximately two months later, I was appointed to represent Andrew Young on appeal. On September 22, 2021, I filed a Notice of Appearance before this Honorable Court.

4. On October 5, 2021, I submitted a Stipulation to enlarge the time for filing the Opening Brief. Pursuant to that Stipulation, this Honorable Court entered an Order setting a deadline of December 17, 2021 for the filing of the Opening Brief.

5. The final transcripts were not filed until November 1, 2021. Shortly thereafter, the Appendix was assembled and Bates stamped.

6. The Appendix consists of seven volumes and over 1300 pages of transcripts and other material. Significantly, Appellant was convicted of over 20 felony offenses, several of which resulted in habitual criminal adjudications. Appellant received multiple, consecutive, 10-life sentences on those habitual criminal adjudications.

7. Given the somewhat voluminous nature of the lower court record; the number and nature of the crimes of which Appellant was convicted; the severity of the sentences imposed; and the fact that the Appendix was completed only a little over a month ago, I am requesting that this Honorable Court enlarge the time for submission of Appellant's Opening Brief 60 days, through and including Tuesday, February 15, 2022.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on the 16<sup>th</sup> day of December, 2021.

*/s/ Nancy M. Lemcke*  
NANCY M. LEMCKE

**CERTIFICATE OF SERVICE**

I hereby certify that this document was filed electronically with the Nevada Supreme Court on the 16<sup>th</sup> day of December, 2021. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

AARON D. FORD  
ALEXANDER CHEN

NANCY M. LEMCKE

I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage pre-paid, addressed to:

ANDREW YOUNG  
NDOC No: 92511  
c/o High Desert State Prison  
P.O. Box 650  
Indian Springs, NV 89070

BY /s/ Nancy M. Lemcke  
Employee, Nancy Lemcke Law, LLC