

ORIGINAL

IN THE SUPREME COURT OF THE STATE OF NEVADA

MICHEAL RIPPO,

S.C. CASE NO. 44094

Appellant,

FILED

vs.

FEB 15 2006

THE STATE OF NEVADA,

Respondent.

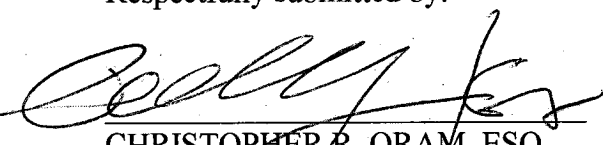
JANETTE M. BLOOM
CLERK OF SUPREME COURT
BY S. Young
DEPUTY CLERK

MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF

COMES NOW, Christopher R. Oram, Esq., attorney for Appellant, MICHEAL RIPPO, and moves this Court for an Order granting an extension of time of thirty (30) days from the date the Reply Brief is now due, to wit: February 13, 2006, and extend the time to and including, March 15, 2006, for the filing of the Reply Brief. This motion is made and based upon NRAP 27 and 31(a), the Affidavit of Christopher R. Oram, Esq., filed herewith, and the Points and Authorities attached hereto.

DATED this 13 day of February, 2006.

Respectfully submitted by:



CHRISTOPHER R. ORAM, ESQ.
Nevada Bar No. 004349
520 S. Fourth Street, 2nd Floor
Las Vegas, Nevada 89101
(702) 384-5563
Attorney for Appellant
MICHEAL RIPPO

RECEIVED
FEB 15 2006
JANETTE M. BLOOM
CLERK OF SUPREME COURT
DEPUTY CLERK

CHRISTOPHER R. ORAM
520 South Fourth Street, Second Floor
Las Vegas, Nevada 89101

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POINTS AND AUTHORITIES

Time for Serving and Filing Briefs.

The appellant shall serve and file the OPENING brief within one hundred and twenty (120) days after the date on which the appeal is docketed in the Supreme Court. The respondent shall serve and file his answering brief within thirty (30) days after service of the brief of the appellant. After service of respondent's brief, any OPENING brief must be served and filed within thirty (30) days. . . . By written stipulation timely filed with the Supreme Court, the parties may extend the time for filing any brief for a total of thirty (30) additional days unless the court otherwise orders. Applications for extensions of time beyond that to which the parties are permitted to stipulate are not favored, and will be considered only on motion for good cause clearly shown, or ex parte in cases of extreme and unforeseeable emergency. The Supreme Court may shorten the periods prescribed above for serving and filing briefs, either by rule for all cases or for classes of cases, or by order for specific cases."

The undersigned has been preparing for Paul Browning v. State of Nevada, C072536, in which Mr. Browning's penalty phase is scheduled for February 22, 2006. Mr. Browning received a sentence of death. The undersigned has been diligently preparing for Mr. Browning for the penalty phase.

Therefore, the undersigned would respectfully request that this Honorable Court grant an extension of thirty (30) days within which to file Appellant's Reply to State's Supplemental Brief.

DATED this 13 day of February, 2006.

Respectfully submitted by:



CHRISTOPHER R. ORAM, ESQ.
Nevada Bar #004349
520 S. Fourth Street, 2nd Floor
Las Vegas, Nevada, 89101

Attorney for Defendant
MICHEAL RIPPO

CHRISTOPHER R. ORAM
520 South Fourth Street, Second Floor
Las Vegas, Nevada 89101

AFFIDAVIT OF CHRISTOPHER R. ORAM
IN SUPPORT OF MOTION FOR EXTENSION OF TIME
TO FILE REPLY BRIEF

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

CHRISTOPHER R. ORAM, ESQ., being first duly sworn, deposes and states:

1. I am an attorney duly licensed to practice law in the State of Nevada. I am counsel for the Appellant in the above-entitled matter. I have personal knowledge of all matters contained herein and am competent to testify thereto.

2. The undersigned has been preparing for Paul Browning v. State of Nevada, C072536, in which Mr. Browning's penalty phase is scheduled for February 22, 2006. Mr. Browning received a sentence of death. The undersigned has been diligently preparing for Mr. Browning for the penalty phase.

3. Additionally, this is the first request for continuance.

4. Therefore, the undersigned would respectfully request that this Honorable Court grant an extension of thirty (30) days within which to file Appellant's Reply to State's Supplemental Brief.

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2 5. That this motion is made in good faith and not for purposes of delay.

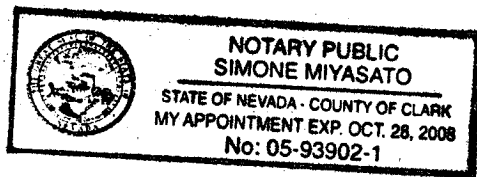
3 FURTHER YOUR AFFIANT SAYETH NAUGHT.

4 DATED this 13 day of February, 2006.

5 *C. Oram*
6 CHRISTOPHER R. ORAM, ESQ.

7 SWORN and SUBSCRIBED before me
8 this 13 day of February, 2006.

9 *Simone Miyasato*
10 NOTARY PUBLIC in and for said
11 County and State



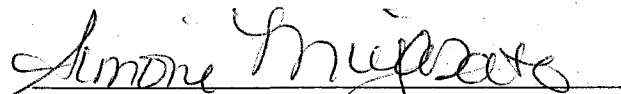
CHRISTOPHER R. ORAM
520 South Fourth Street, Second Floor
Las Vegas, Nevada 89101

CERTIFICATE OF MAILING

I hereby certify that I am an employee of CHRISTOPHER R. ORAM, ESQ., and that on the 13 day of February, 2006, I did deposit in the United States Postal Service office at Las Vegas, Nevada, in a sealed envelope with postage fully pre-paid thereon, a true and correct copy of the above and foregoing **MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF**, addressed to:

David Roger
District Attorney
200 Lewis Avenue
Las Vegas, Nevada 89155

George Chanos
Attorney General
100 North Carson Street
Carson City, Nevada 89701-4717


An Employee of Christopher R. Oram, Esq.

CHRISTOPHER R. ORAM
520 South Fourth Street, Second Floor
Las Vegas, Nevada 89101