

ORIGINAL

IN THE SUPREME COURT OF THE STATE OF NEVADA

MICHAEL RIPPO,

S.C. CASE NO. 44094

Appellant,

FILED

vs.

AUG 23 2005

THE STATE OF NEVADA,

Respondent.

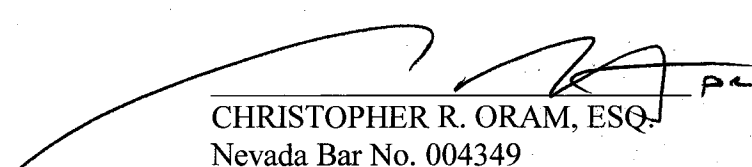
JANETTE M. BLOOM
CLERK OF SUPREME COURT
BY S. Young
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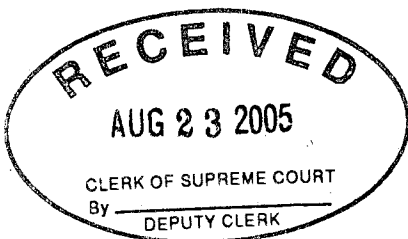
MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF

COMES NOW, Christopher R. Oram, Esq., attorney for Appellant, MICHAEL RIPPO, and moves this Court for an Order granting an extension of time of seven (7) days from the date the Reply Brief is now due, to wit: August 22, 2005, and extend the time to and including, August 29, 2005, 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 22 day of August, 2005.

Respectfully submitted by:


CHRISTOPHER R. ORAM, ESQ.
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520 S. Fourth Street, 2nd Floor
Las Vegas, Nevada 89101
(702) 384-5563
Attorney for Appellant
MICHAEL RIPPO



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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 State of Nevada v. Anabel Espindola, C212667, in which the undersigned has been preparing for Ms. Espindola's pretrial writ of habeas corpus. The preliminary hearing transcripts were very voluminous and Ms. Espindola had several significant issues which needed to be briefed. The undersigned wishes to be fully prepared for Mr. Rippo's reply brief. Mr. Rippo received a sentence of death and the undersigned will need an additional seven days to adequately prepare the reply brief. This is the second request for extension of time regarding the reply brief. However, this will be last request for extension of time.

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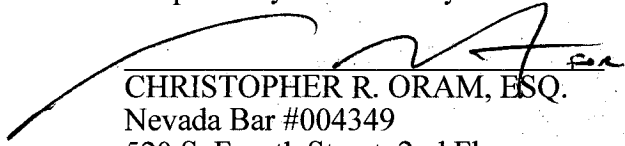
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1 Therefore, the undersigned would respectfully request that this Honorable Court grant
2 an extension of seven (7) days within which to file Appellant's Reply Brief.

3 DATED this 22 day of August, 2005.

4 Respectfully submitted by:

5 
6 CHRISTOPHER R. ORAM, ESQ.
7 Nevada Bar #004349
8 520 S. Fourth Street, 2nd Floor
9 Las Vegas, Nevada, 89101

10 Attorney for Defendant
11 MICHEAEL RIPPO

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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 22 day of August, 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 S. Third Street, 7th Floor
Las Vegas, Nevada 89155

Brian Sandoval
Attorney General
100 North Carson Street
Carson City, Nevada 89701-4717

Aimone Miyarate
An Employee of Christopher R. Oram, Esq.

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