

IN THE SUPREME COURT OF THE STATE OF NEVADA

MICHAEL RIPPO,

S.C. CASE NO. 44094

Appellant,

vs.

FILED

THE STATE OF NEVADA,

JUL 22 2005

Respondent.

JANETTE M. BLOOM
CLERK OF SUPREME COURT
BY *[Signature]*
DEPUTY CLERK

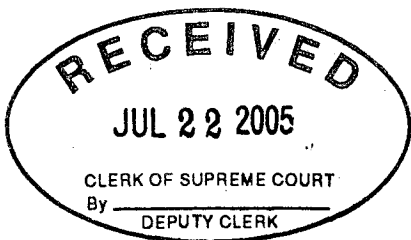
MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF

COMES NOW, Christopher R. Oram, Esq., attorney for Appellant, MICHAEL RIPPO, and moves this Court for an Order granting an extension of time of thirty (30) days from the date the Reply Brief is now due, to wit: July 21, 2005, and extend the time to and including, August 22, 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 21 day of July, 2005.

Respectfully submitted by:

[Signature]
CHRISTOPHER R. ORAM, ESQ.
Nevada Bar No. 004349
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."

That the undersigned has been preparing for several cases. The undersigned has been preparing for State of Nevada v. Darrius Taylor, in which Mr. Taylor's reply brief in support of defendant's writ of habeas corpus is scheduled for filing on July 22, 2005. The undersigned is also preparing for State of Nevada v. Myron Davis, C209068, in which the undersigned has been preparing for pretrial motions which are scheduled for filing on July 22, 2005. The undersigned is aware that case load is not an excuse for extension of time. Additionally, since Mr. Rippo received a sentence of death and the undersigned wished to be fully prepared when drafting the reply brief. This is the first request for extension of time regarding Mr. Rippo's reply brief.

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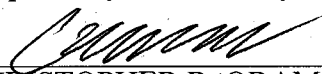
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1 Therefore, the undersigned would respectfully request that this Honorable Court grant
2 an extension of thirty (30) days within which to file Appellant's Reply Brief.
3

4 DATED this 21 day of July, 2005.

5 Respectfully submitted by:

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

9 Attorney for Defendant
10 MICHAEL RIPPO
11

12 CHRISTOPHER R. ORAM
13 520 South Fourth Street, Second Floor
14 Las Vegas, Nevada 89101
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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. That the undersigned has been preparing for several cases. The undersigned has been preparing for State of Nevada v. Darrius Taylor, in which Mr. Taylor's reply brief in support of defendant's writ of habeas corpus is scheduled for filing on July 22, 2005. The undersigned is also preparing for State of Nevada v. Myron Davis, C209068, in which the undersigned has been preparing for pretrial motions which are scheduled for filing on July 22, 2005.

3. The undersigned is aware that case load is not an excuse for extension of time.

4. Mr. Rippo received a sentence of death and the undersigned wished to be fully prepared when drafting the reply brief.

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

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

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

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CERTIFICATE OF MAILING

I hereby certify that I am an employee of CHRISTOPHER R. ORAM, ESQ., and that on the 21 day of July, 2004, 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

Almone Mignato
An Employee of Christopher R. Oram, Esq.

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