

IN THE SUPREME COURT OF THE STATE OF NEVADA

DAMON LAMAR CAMPBELL,

S.C. CASE NO. 44799

Appellant,

vs.

THE STATE OF NEVADA,

Respondent.

FILED

JAN 10 2006

JANETTE M. BROWN
CLERK OF SUPREME COURT
DEPUTY CLERK

MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF

COMES NOW, Christopher R. Oram, Esq., attorney for Appellant, DAMON LAMAR CAMPBELL, and moves this Court for an Order granting an extension of time of twenty one (21) days from the date the Reply Brief is now due, to wit: January 9, 2006 and extend the time to and including, January 30, 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 4 day of January, 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
DAMON LAMAR CAMPBELL

JAN 10 2006

06-00642

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

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2 **POINTS AND AUTHORITIES**

3 Time for Serving and Filing Briefs.

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

22 That Appellant's Reply Brief in this matter is currently due on January 9, 2006.

23 This is the second request for extension of time. The undersigned has been preparing for
24 John Ingebretson v. State of Nevada, C175709, in which Mr. Ingebretson's reply to
25 state's response to defendant's writ of habeas corpus is scheduled for filing on January
26 13, 2006. Additionally, the undersigned has been preparing for Joseph Antonetti v. State
27 of Nevada, 42917, in which Mr. Antonetti's petition for rehearing is scheduled for filing
28 on January 23, 2006. Further, the undersigned has spoken to Mr. Campbell and wishes
to speak with him one more time before the submission of his reply brief, so all of Mr.
Campbell's concerns may be fully addressed.

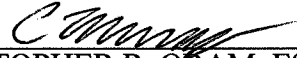
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1 Therefore, the undersigned would respectfully request that this Honorable Court
2 grant an extension of twenty one (21) days within which to file Appellant's Reply Brief.
3

4 DATED this 6 day of January, 2006.

5 Respectfully submitted by:

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

9 Attorney for Defendant
10 DAMON LAMAR CAMPBELL

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

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2 **AFFIDAVIT OF CHRISTOPHER R. ORAM**
3 **IN SUPPORT OF MOTION FOR EXTENSION OF TIME**
4 **TO FILE OPENING BRIEF**

5 STATE OF NEVADA)
6) ss:
7 COUNTY OF CLARK)

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

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

12 2. That Appellant's Reply Brief in this matter is currently due on January 9,
13 2006.

14 3. This is the second request for extension of time. The undersigned has
15 been preparing for John Ingebretson v. State of Nevada, C175709, in which Mr.
16 Ingebretson's reply to state's response to defendant's writ of habeas corpus is scheduled
17 for filing on January 13, 2006. Additionally, the undersigned has been preparing for
18 Joseph Antonetti v. State of Nevada, 42917, in which Mr. Antonetti's petition for
19 rehearing is scheduled for filing on January 23, 2006. Further, the undersigned has
20 spoken to Mr. Campbell and wishes to speak with him one more time before the
21 submission of his reply brief, so all of Mr. Campbell's concerns may be fully addressed.
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CHRISTOPHER R. ORAM
520 South Fourth Street, Second Floor
Las Vegas, Nevada 89101

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4. Therefore, the undersigned would respectfully request that this Honorable Court grant an extension of twenty one (21) days within which to file Appellant's Reply Brief.

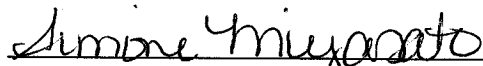
5. That this motion is made in good faith and not for purposes of delay.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

DATED this 6 day of January, 2006.


CHRISTOPHER R. ORAM, ESQ.

SWORN and SUBSCRIBED before me
this 6 day of January, 2006.


NOTARY PUBLIC in and for said
County and State

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

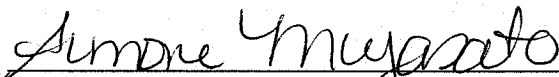
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CERTIFICATE OF MAILING

I hereby certify that I am an employee of CHRISTOPHER R. ORAM, ESQ., and
that on the 6 day of January, 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