

ORIGINAL

IN THE SUPREME COURT OF THE STATE OF NEVADA

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DAMON LAMAR CAMPBELL,

S.C. CASE NO. 44799

Appellant,

**FILED**

vs.

**JUN 27 2005**

THE STATE OF NEVADA,

Respondent.

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

**MOTION FOR EXTENSION OF TIME TO FILE OPENING 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 thirty (30) days from the date the Opening Brief is now due, to wit: June 30, 2005, and extend the time to and including, August 1, 2005 for the filing of the Opening 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 24 day of June, 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  
DAMON LAMAR CAMPBELL

**RECEIVED**

**JUN 27 2005**

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."

That Appellant's Opening Brief in this matter is currently due on June 30, 2005.

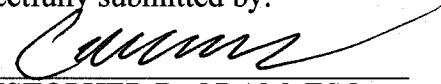
The undersigned will be out of the jurisdiction on personal leave from June 27, 2005 and will return on July 8, 2005. This is the first request for continuance in this matter. Mr. Campbell has been notified of this continuance and has no objection.

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

4 DATED this 24 day of June, 2005.

5 Respectfully submitted by:

6 

7 CHRISTOPHER R. ORAM, ESQ.

8 Nevada Bar #004349

9 520 S. Fourth Street, 2nd Floor

10 Las Vegas, Nevada, 89101

11 Attorney for Defendant

12 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 Opening Brief in this matter is currently due on June 30,  
13 2005.

14 3. The undersigned will be out of the jurisdiction on personal leave from  
15 June 27, 2005 and will return on July 8, 2005. Mr. Campbell has been notified of this  
16 continuance and has no objection.

17 5. This is the first request for extension.

18 6. Therefore, the undersigned would respectfully request that this Honorable  
19 Court grant an extension of thirty (30) days within which to file Appellant's Opening  
20 Brief.  
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**CHRISTOPHER R. ORAM**  
520 South Fourth Street, Second Floor  
Las Vegas, Nevada 89101

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

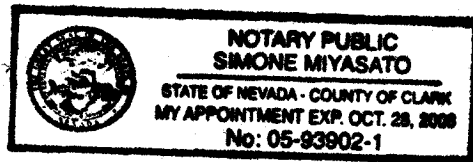
3 FURTHER YOUR AFFIANT SAYETH NAUGHT.

4 DATED this 24 day of June, 2005.

5   
6 CHRISTOPHER R. ORAM, ESQ.

7 SWORN and SUBSCRIBED before me  
8 this 24 day of June, 2005.

9   
10 NOTARY PUBLIC in and for said  
11 County and State



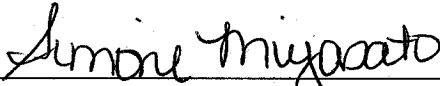
CHRISTOPHER R. ORAM  
520 South Fourth Street, Second Floor  
Las Vegas, Nevada 89101

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2 **CERTIFICATE OF MAILING**

3 I hereby certify that I am an employee of CHRISTOPHER R. ORAM, ESQ., and  
4 that on the 24 day of June, 2005, I did deposit in the United States Postal Service office  
5 at Las Vegas, Nevada, in a sealed envelope with postage fully pre-paid thereon, a true and  
6 correct copy of the above and foregoing **MOTION FOR EXTENSION OF TIME TO**  
7 **FILE OPENING BRIEF**, addressed to:  
8

9 David Roger  
10 District Attorney  
11 200 S. Third Street, 7th Floor  
12 Las Vegas, Nevada 89155

13 Brian Sandoval  
14 Attorney General  
15 100 North Carson Street  
16 Carson City, Nevada 89701-4717

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19 An Employee of Christopher R. Oram, Esq.  
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CHRISTOPHER R. ORAM  
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Las Vegas, Nevada 89101