

ORIGINAL

1 JoNell Thomas
2 State Bar No. 4771
3 c/o Clark County Special Public Defender
4 330 South Third Street, Suite 800
5 Las Vegas, Nevada 89155
6 (702) 455-6270
7 Attorney for Petitioner
8 ANABEL ESPINDOLA

IN THE SUPREME COURT OF THE STATE OF NEVADA

9 **LUIS HIDALGO III and**
10 **ANABEL ESPINDOLA,**
11 **Petitioners,**

12 vs.

13 **THE HONORABLE DONALD M.**
14 **MOSLEY, EIGHTH JUDICIAL**
15 **DISTRICT COURT JUDGE,**
16 **Respondent,**

17 and

18 **THE STATE OF NEVADA,**
19 **Real Party in Interest.**

Supreme Court No. 48233

District Court No. C212667

**MOTION FOR EXTENSION OF
TIME FOR FILING OF ANSWER
TO PETITION FOR REHEARING**

FILED

MAR 11 2008

TRACIE K. LINDEMAN
CLERK OF SUPREME COURT
BY *R. Malone*
DEPUTY CLERK

20 Petitioner Anabel Espindola, by and through her counsel JoNell Thomas,
21 respectfully requests that she be granted an extension of time for the filing of her
22 Answer to the State's Rehearing Petition. On or about February 24, 2008, Espindola
23 filed in this Court a notice that this matter appeared to be moot as to her because she
24 had negotiated the charges against her with the State and the State is no longer seeking
25 the death penalty against her. The State has not file an opposition. Should this Court
26 find Espindola's petition to be moot and order the petition dismissed, it will not be
27 necessary for her to file an Answer to the State's Rehearing Petition. Should this

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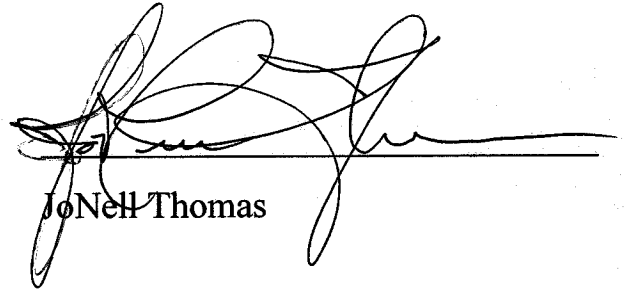
MAR 11 2008

TRACIE K. LINDEMAN
CLERK OF SUPREME COURT
DEPUTY CLERK

08 - 06089

1 Court find that the petition is not moot, Espindola respectfully requests that she be
2 granted seven days from the date of that decision to file an Answer.

3 Dated this 7th day of March, 2008.

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5 _____
6 Jo Nell Thomas
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I caused to be hand-delivered to the District Attorney's
3 drop-box in the office of the Clark County Clerk, and caused to be hand-delivered to
4 the office of Honorable Donald M. Mosley, Eighth Judicial District Court, a true and
5 correct copy of this **MOTION FOR EXTENSION OF TIME FOR FILING OF**
6 **ANSWER TO PETITION FOR REHEARING** addressed to

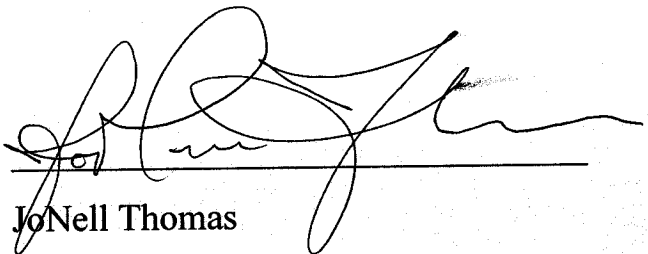
7
8 The Honorable Donald M. Mosley
Eighth Judicial District Court
9 200 Lewis Avenue
Las Vegas, NV 89155
10

11 Marc DiGiacomo
Chief Deputy District Attorney
12 200 Lewis Avenue
Las Vegas, NV 89155
13

14 I also caused a copy of the foregoing to be mailed, postage prepaid, to counsel for
Luis Hidalgo III, addressed to:

15 Dominic P. Gentile
Gordon & Silver
16 3960 Howard Hughes Pkwy
Las Vegas, NV 89169
17

18 Dated this 7th day of March, 2008.

19 
20 Jo Nell Thomas
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