

ORIGINAL

IN THE SUPREME COURT OF THE STATE OF NEVADA

MARK R. ZANA ,

S.C. CASE NO. 50786

Appellant,

vs.

THE STATE OF NEVADA,

Respondent.

FILED

MAY 28 2008

TRACIE K. LINDEMAN
CLERK OF SUPREME COURT
BY S. Young
DEPUTY CLERK

MOTION FOR EXTENSION OF TIME TO FILE OPENING BRIEF

COMES NOW, Christopher R. Oram, Esq., attorney for Appellant, MARK R. ZANA , and moves this Court for an Order granting an extension of time of twenty (21) days from the date the Opening Brief is now due, to wit: May 27, 2008, and extend the time to and including, June 17, 2008, 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 27 day of May, 2008.

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

MARK R. ZANA

RECEIVED

MAY 28 2008

TRACIE K. LINDEMAN
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 May 27, 2008.

This is the second request for continuance. The undersigned has completed Mr. Zana's brief. Additionally, Mr. Zana's brief is approximately 66 pages as of today's date. However, Mr. Zana has asked to review the opening brief before it's submission to this Court. Therefore, the undersigned would respectfully request an additional twenty one (21) days for the filing of the opening brief and appendix. This will give the undersigned an opportunity to send the brief to Mr. Zana and thereafter, the undersigned and Mr. Zana will have an adequate amount of time to discuss and make any necessary revisions.

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AFFIDAVIT OF CHRISTOPHER R. ORAM
IN SUPPORT OF MOTION FOR EXTENSION OF TIME
TO FILE OPENING 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 Appellant's Opening Brief in this matter is currently due on August 15, 2007.

3. This is the second request for continuance. The undersigned has completed Mr. Zana's brief. However, Mr. Zana has asked to review the opening brief before it's submission to this Court. Therefore, the undersigned would respectfully request an additional twenty one (21) days for the filing of the opening brief and appendix. This will give the undersigned an opportunity to send the brief to Mr. Zana and thereafter, the undersigned and Mr. Zana will have an adequate amount of time to discuss and make any necessary revisions.

4. Therefore, the undersigned would respectfully request an extension of time of thirty (30) days to prepare and submit the opening brief and appendix.

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



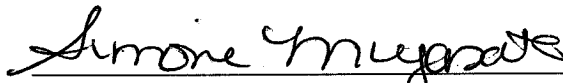
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CERTIFICATE OF MAILING

I hereby certify that I am an employee of CHRISTOPHER R. ORAM, ESQ., and
that on the 27 day of May, 2008, 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 OPENING BRIEF**, addressed to:

David Roger
District Attorney
200 Lewis Avenue
Las Vegas, Nevada 89155

Catherine Cortez Masto
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