

IN THE SUPREME COURT OF THE STATE OF NEVADA

MARK R. ZANA ,

S.C. CASE NO. 50786

Appellant,

FILED

vs.

OCT 08 2008

THE STATE OF NEVADA,

TRACIE K. LINDEMAN
CLERK OF SUPREME COURT
BY Tracie K. Lindeman
DEPUTY CLERK

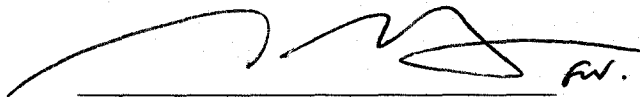
Respondent.

MOTION FOR EXTENSION OF TIME TO FILE REPLY 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 sixty (60) days from the date the Reply Brief is now due, to wit: October 6, 2008, and extend the time to and including, December 4, 2008, 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 6 day of October, 2008.

Respectfully submitted by:



CHRISTOPHER R. ORAM, ESQ.

Nevada Bar No. 004349

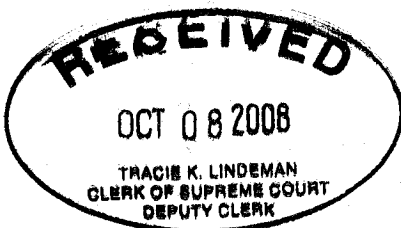
520 S. Fourth Street, 2nd Floor

Las Vegas, Nevada 89101

(702) 384-5563

Attorney for Appellant

MARK R. ZANA



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

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."

This is the first request for extension of time regarding Mr. Zana's reply brief. The undersigned has been preparing for State of Nevada v. Marc Colon, (Baby Jane Cordova Doe) C220720, in which trial commenced on September 11, 2008. Mr. Colon's case is complex and voluminous. Additionally, the undersigned will need a sixty (60) day extension as Mr. Zana's case is also voluminous and complex.

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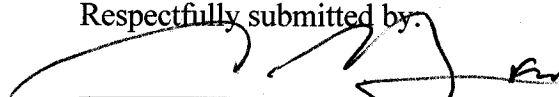
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1 Therefore, the undersigned would respectfully request that this Honorable Court grant
2 an extension of sixty (60) days within which to file Appellant's Reply Brief.

3 DATED this 6 day of October, 2008.

4 Respectfully submitted by:

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

10 Attorney for Defendant
11 MARK R. ZANA

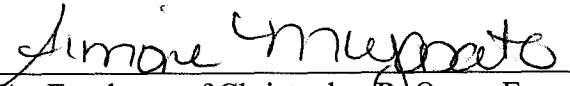
12 CHRISTOPHER R. ORAM
13 520 South Fourth Street, Second Floor
14 Las Vegas, Nevada 89101
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CERTIFICATE OF MAILING

I hereby certify that I am an employee of CHRISTOPHER R. ORAM, ESQ., and that on the 4 day of October, 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 REPLY 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.

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