

IN THE SUPREME COURT OF THE STATE OF NEVADA

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KIRSTIN BLAISE LOBATO,

Petitioner,

vs.

STATE OF NEVADA,

Respondents.

Case No.: 58913

Electronically Filed  
Dec 06 2011 02:56 p.m.  
Tracie K. Lindeman  
Clerk of Supreme Court

MOTION FOR EXTENSION OF TIME

Attorney for Petitioner  Travis N. Barrick, SBN 9257 Gallian Wilcox Welker Olson & Beckstrom, LC 540 E St. Louis Avenue Las Vegas, Nevada 89104	Attorneys for Respondents  David Roger, SBN 2781 Steven S. Owens, SBN 4352 Clark County District Attorney 200 Lewis Avenue Las Vegas, NV 89155
	Attorney for Respondents  Catherine Cortez-Masto Nevada Attorney General 100 N. Carson Street Carson City, NV 89701

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2 Pursuant to NRAP 31 (b)(3), Appellant Kirstin Blaise Lobato, by and through her  
3 attorney of record, Travis N. Barrick, Esq., of the law firm of Gallian, Wilcox, Welker,  
4 Olson & Beckstrom, LC, hereby submits her Motion for Extension of Time to file  
5 Appellant's Opening Brief. This Motion is based upon the papers and pleadings on file  
6 herein.  
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- 8 1. The current due date for Appellant's Opening Brief is December 7, 2011.
- 9 2. On September 1, 2011, Appellant's Motion for Full Briefing was granted and the  
10 Appellant's Opening Brief was ordered due on November 30, 2011. On  
11 November 30, 2011, Appellant has received one 5-day extension of time pursuant  
12 to NRAP (b)(1).  
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- 14 3. No previous requests for extension of time have been denied or denied in part.
- 15 4. Grounds – Appellant's habeas petition raised 79 grounds, and included 101  
16 exhibits. An exhaustive briefing of all 79 grounds involves extensive review of  
17 the petition, the State's response and the District Court's Order. Interlinking the  
18 numerous arguments, findings of fact and conclusions of law is a monumental  
19 task for pro bono counsel.  
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- 21 5. Appellant seeks an additional 60-day extension, (through the holiday period) until  
22 January 30, 2012.  
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1 Pursuant to NRAP 31 (b)(2), Appellant's counsel sought an extension of time by way  
2 of stipulation with counsel for the State, which was declined.

3 Respectfully submitted,


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6 By: 

7 Travis N. Barrick, SBN 9257  
8 Gallian, Wilcox, Welker,  
9 Olson & Beckstrom, LC  
10 Pro bono counsel for Petitioner  
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**CERTIFICATE OF MAILING**

I HEREBY CERTIFY that on the 1<sup>st</sup> day of December, 2011, a copy of the foregoing upon each of the parties by hand delivery and depositing a copy of same in a sealed envelope in the U. S. mail, registered, first-class postage fully prepaid, and addressed to those counsel of record:

David Rogers, Esq. Steven S. Owens, Esq. District Attorney's Office 200 Lewis Avenue Las Vegas. Nevada 89155	Catherine Cortez-Masto, Esq. Office of the Attorney General 555 E. Washington Avenue, Suite 3900 Las Vegas, NV 89101
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Tonya Baltazar An Employee of  
GALLIAN, WILCOX, WELKER  
OLSON & BECKSTROM LC