

MEMORANDUM

I, Travis Barrick, am pro bono counsel of record for the Petitioner, Kirsten Blaise Lobato, in the above-referenced matter. Pursuant to NRAP 31(b)(3)(A),

- (i) The current due date for Mr. Lobato's Reply Brief is August 6, 2012;
- (ii) The State has requested and received one 30 day extension of time to file its Response. Ms. Lobato has not yet requested any extensions of time;
- (iii) No request for extension by either party has been denied;
- (iv) Ms. Lobato is requesting an extension of 60 days, thereby making her Reply due on October 8, 2012.

Good cause exists for the requested extension because of the sheer volume of issues, pleadings and documents involved. The State's Response is approximately 102 pages long and the legal issues are hotly contested, both on the facts and the law.

In addition, unlike the State with its vast resources of personnel and expertise, Ms. Lobato is represented by pro bono counsel and volunteers. This motion is made in good faith and not for the purposes of undue delay.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated this 2nd day of August, 2012.

By: /s/ Travis N. Barrick
Travis N. Barrick, SBN 9257
Gallian, Wilcox, Welker,
Olson & Beckstrom, LC
Attorney for Petitioner

CERTIFICATE OF FILING

I HEREBY CERTIFY that on the 2nd day of August, 2012, this document was filed electronically with the Nevada Supreme Court and electronic service accomplished on the following:

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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/s/ Jenna Gonzalez

Jenna Gonzalez, an Employee of
GALLIAN, WILCOX, WELKER,
OLSON & BECKSTROM LC