IN THE SUPREME COURT OF THE STATE OF NEVADA

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KIRSTIN BLAISE LOBATO, Petitioner,	Case No.: 58913	Electronically Filed Aug 02 2012 10:10 a.m. Tracie K. Lindeman Clerk of Supreme Court
VS.	}	
STATE OF NEVADA,	}	
Respondents.)	

MOTION FOR EXTENSION OF TIME

COMES NOW, TRAVIS N. BARRICK, pro bono counsel for the Petitioner, Kirsten Blaise Lobato, and moves this Honorable Court for an enlargement of time of sixty (60) days from August 6, 2012 until October 8, 2012, pursuant to NRAP 31(b)(3). This motion is based upon the memorandum below and all papers and pleadings on file herein.

Travis N. Barrick, SBN 9257 Gallian, Wilcox, Welker, Olson & Beckstrom, LC 540 E St. Louis Avenue Las Vegas, Nevada 89104 Attorney for Petitioner

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.	Catherine Cortez-Masto, Esq.	
District Attorney's Office	Office of the Attorney General	
200 Lewis Avenue	555 E. Washington Avenue, Suite 3900	
Las Vegas. Nevada 89155	Las Vegas, NV 89101	

<u>/s/ Jenna Gonzalez</u>

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