

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

Respondent.

APPELLANT'S MOTION FOR EXTENSION OF TIME

Comes Now Appellant GUILLERMO RENTERIO-NOVOA, by and through Deputy Public Defender NANCY LEMCKE, and moves for a sixty (60) day extension of time from Friday, March 8, 2013, through and including Tuesday, May 7, 2013, within which to file the Opening Brief in this case. This Motion is based upon the attached Declaration of counsel.

DATED this 8th day of March, 2013.

PHILIP J. KOHN
CLARK COUNTY PUBLIC DEFENDER

By

NANCY L. LEMCKE, #5416
Deputy Public Defender
309 So. Third Street, Suite #226
Las Vegas, Nevada 89155-2610
(702) 455-4685

DECLARATION OF NANCY L. LEMCKE

1
2 1. I am an attorney licensed to practice law in the State of Nevada; I am a deputy
3 public defender assigned to handle the appeal of this matter; I am familiar with the procedural
4 history of this case.
5

6 2. This appeal arises from a multiple-count Sexual Assault on a Minor Case.
7 Appellant was convicted of 36 sex-related offenses for which he received numerous life
8 sentences.
9

10 3. I just received the completed Appendix yesterday, March 7, 2013. As
11 currently constituted, the Appendix consists of over 1400 pages. Based on my very cursory
12 review of the case, it appears that the instant appeal will involve complex and, in some cases,
13 constitutionally significant issues. Those issues include, but are not limited to: the propriety of
14 the prosecutor's excusal of minority panelists from the jury venire; the trial court's refusal to
15 allow the defense to present certain evidence critical to the defense case theory; the trial court's
16 refusal to issue a pre-trial ruling precluding use of the term 'victim' and precluding de facto
17 expert testimony by investigating officers; the trial court's refusal to declare a mistrial following
18 the revelation that the complainant, an illegal immigrant, was receiving a benefit in the form of a
19 special visa granted crime victims.
20

21 4. Based on the severity of the instant charges, the voluminous nature of the
22 lower court record, and the magnitude and complexity of the issues likely to merit inclusion in
23 the Appellant's briefing submission, I am requesting a 60-day enlargement of time within which
24 to file the instant Opening Brief.
25

26 ///

27 ///

28 ///

1 5. This Motion for Extension is made in good faith and not for the purpose of
2 delay.

3 I declare under penalty of perjury that the foregoing is true and correct.

4 EXECUTED on the 8th day of March 2013

5 
6 _____
7 NANCY L. LEMCKE
8
9

10 **CERTIFICATE OF SERVICE**

11 I hereby certify that this document was filed electronically with the Nevada
12 Supreme Court on the 8th day of March, 2013. Electronic Service of the foregoing document
13 shall be made in accordance with the Master Service List as follows:

14 CATHERINE CORTEZ MASTO
15 STEVEN S. OWENS

NANCY L. LEMCKE
HOWARD S. BROOKS

16 I further certify that I served a copy of this document by mailing a true and
17 correct copy thereof, postage pre-paid, addressed to:

18 GUILLERMO RENTERIO-NOVOA
19 NDOC No. 1092343
20 c/o High Desert State Prison
21 P.O. Box 650
22 Indian Springs, NV 89018

23 BY 

24 _____
25 Employee, Clark County Public
26 Defender's Office
27
28