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Nov 13 2013 03:40 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

IN THE SUPREME COURT OF THE STATE OF NEVADA

RICKIE SLAUGHTER, JR.

Appellant,

vs.

THE STATE OF NEVADA

Respondent.

CASE NO. : 61991

**MOTION FOR EXTENSION OF TIME TO
FILE APPELLANT'S REPLY BRIEF**

(FIRST REQUEST)

COMES NOW, Appellant RICKIE SLAUGHTER, JR. by and through appointed counsel, William H. Gamage, Esq. of Gamage & Gamage and makes this Motion For Extension of Time to File Opening Brief And Appendix pursuant to NRAP 31. Appellant makes this Motion based upon all papers and pleadings on file with this Court, the below memorandum of points and authorities, along with any oral argument deemed necessary by this Court.

MEMORANDUM OF POINTS AND AUTHORITIES

Appellant requests an extension of 10 days in order to file the Opening Brief in support thereof based upon the following:

1. On or about September 14, 2013, Appellant filed his Opening Brief and Appellant's Index;
2. On or about October 10, 2013, the State filed Respondent's Answering Brief totaling 54 pages;
3. Appellant's Reply Brief is due November 12, 2013;

4. The length and number of issues brought by the State in its Response Brief are numerous and, therefore, require more time and attention than the average appeal;

5. Appellant's Counsel is the co-owner of a law firm with two attorneys and a large caseload;

6. Appellant's Counsel has completed a substantive draft of this brief;

7. Because of Appellant's Counsel's caseload and the complexity of the issues brought by the State in its brief, Appellant's Counsel believes that he needs 10 more days to revise, provide proper citations, and edit his brief;

8. A grant of a 10 day extension would make Appellant's Reply Brief due on November 22, 2013;

9. This Motion is submitted in accordance with the requirements of NRAP 31(b)(3). Further, this request for extension is not made for any undue purpose such as to prejudice any party or to improperly delay these proceedings.

DATED THIS 12th day of November, 2013.

GAMAGE & GAMAGE

/s/ William H. Gamage, Esq.

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DECLARATION OF WILLIAM H. GAMAGE, ESQ.

COUNTY OF CLARK)
) ss:
STATE OF NEVADA)

I, William H. Gamage, Esq, being duly sworn deposes and states under penalty of perjury that I am above the age of 18 years and offer the following information for which I am competent to testify:

- 1. I am a Nevada licensed attorney certified to practice in all Nevada Courts.
- 2. That I was appointed to represent Rickie Slaughter in his above titled appeal.
- 3. On or about September 14, 2013, Appellant filed his Opening Brief and Appellant’s Index;
- 4. On or about October 10, 2013, the State filed Respondent’s Answering Brief totaling 54 pages;
- 5. Appellant’s Reply Brief is due November 12, 2013;
- 6. The length and number of issues brought by the State in its Response Brief are numerous and, therefore, require more time and attention than the average appeal;
- 7. Appellant’s Counsel is the co-owner of a law firm with two attorneys and a large caseload;
- 8. Appellant’s Counsel has completed a substantive draft of this brief;
- 9. Because of Appellant’s Counsel’s caseload and the complexity of the issues brought by the State in its brief, Appellant’s Counsel believes that he needs 10 more days to revise, provide proper citations, and edit his brief;
- 10. A grant of a 10 day extension would make Appellant’s Reply Brief due on November 22, 2013;

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11. This Motion is submitted in accordance with the requirements of NRAP 31(b)(3).
Further, this request for extension is not made for any undue purpose such as to
prejudice any party or to improperly delay these proceedings.

FURTHER DECLARANT SAYETH NAUGHT

/s/ William H. Gamage

William H. Gamage, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of November, 2013, I served a true and correct copy
of the above and foregoing **Motion For Extension of Time to File Opening Brief And
Appendix (First Request)** via first-class mail, postage prepaid, addressed to the following:

STEVEN B. WOLFSON
District Attorney's Office
200 E. Lewis Ave.
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22010 Cold Creek Road
Indian Springs, Nevada 89070

/s/ William H. Gamage, Esq.

Employee of GAMAGE & GAMAGE