1 2 3 4 5 6	GAMAGE & GAMAGE William H. Gamage, Esq. Nevada Bar No. 009024 5580 South Fort Apache Street, Suite 110 Las Vegas, Nevada 89148 Telephone: (702) 386-9529 Facsimile: (702) 382-9529 Attorneys for Appellant	Electronically Filed Nov 13 2013 03:40 p.m. Tracie K. Lindeman Clerk of Supreme Court	
7	IN THE SUPREME COURT OF THE STATE OF NEVADA		
8	RICKIE SLAUGHTER, JR.)	
9 10	Appellant,) CASE NO.: 61991	
10	VS.		
11	THE STATE OF NEVADA)) MOTION FOR EXTENSION OF TIME TO	
13	Respondent.) MOTION FOR EXTENSION OF TIME TO) FILE APPELLANT'S REPLY BRIEF	
14	Kespondent.) (<u>FIRST REQUEST</u>)	
15)	
	COMES NOW, Appellant RICKIE SLAUGHTER, JR. by and through appointed		
16		, , , , , , , , , , , , , , , , , , , ,	
16 17		e & Gamage and makes this Motion For Extension	
	counsel, William H. Gamage, Esq. of Gamag		
17	counsel, William H. Gamage, Esq. of Gamag of Time to File Opening Brief And Appendix	e & Gamage and makes this Motion For Extension	
17 18	counsel, William H. Gamage, Esq. of Gamag of Time to File Opening Brief And Appendix	e & Gamage and makes this Motion For Extension pursuant to NRAP 31. Appellant makes this Motion ith this Court, the below memorandum of points and	
17 18 19	counsel, William H. Gamage, Esq. of Gamag of Time to File Opening Brief And Appendix based upon all papers and pleadings on file wi authorities, along with any oral argument deer	e & Gamage and makes this Motion For Extension pursuant to NRAP 31. Appellant makes this Motion ith this Court, the below memorandum of points and	
17 18 19 20	counsel, William H. Gamage, Esq. of Gamag of Time to File Opening Brief And Appendix based upon all papers and pleadings on file wi authorities, along with any oral argument deer <u>MEMORANDUM OF P</u>	e & Gamage and makes this Motion For Extension pursuant to NRAP 31. Appellant makes this Motion ith this Court, the below memorandum of points and ned necessary by this Court.	
17 18 19 20 21	counsel, William H. Gamage, Esq. of Gamag of Time to File Opening Brief And Appendix based upon all papers and pleadings on file wi authorities, along with any oral argument deer <u>MEMORANDUM OF P</u>	e & Gamage and makes this Motion For Extension pursuant to NRAP 31. Appellant makes this Motion ith this Court, the below memorandum of points and ned necessary by this Court. OINTS AND AUTHORITIES	
17 18 19 20 21 22	counsel, William H. Gamage, Esq. of Gamag of Time to File Opening Brief And Appendix based upon all papers and pleadings on file wi authorities, along with any oral argument deer <u>MEMORANDUM OF P</u> Appellant requests an extension of 10 thereof based upon the following: 1. On or about September 14, 2013, A	e & Gamage and makes this Motion For Extension pursuant to NRAP 31. Appellant makes this Motion ith this Court, the below memorandum of points and ned necessary by this Court. OINTS AND AUTHORITIES	
 17 18 19 20 21 22 23 	counsel, William H. Gamage, Esq. of Gamag of Time to File Opening Brief And Appendix based upon all papers and pleadings on file wi authorities, along with any oral argument deer <u>MEMORANDUM OF P</u> Appellant requests an extension of 10 thereof based upon the following: 1. On or about September 14, 2013, A Index;	e & Gamage and makes this Motion For Extension pursuant to NRAP 31. Appellant makes this Motion ith this Court, the below memorandum of points and ned necessary by this Court. OINTS AND AUTHORITIES days in order to file the Opening Brief in support appellant filed his Opening Brief and Appellant's	
 17 18 19 20 21 22 23 24 	 counsel, William H. Gamage, Esq. of Gamag of Time to File Opening Brief And Appendix based upon all papers and pleadings on file will authorities, along with any oral argument deer <u>MEMORANDUM OF P</u> Appellant requests an extension of 10 thereof based upon the following: On or about September 14, 2013, A Index; On or about October 10, 2013, the St 	e & Gamage and makes this Motion For Extension pursuant to NRAP 31. Appellant makes this Motion ith this Court, the below memorandum of points and ned necessary by this Court. OINTS AND AUTHORITIES days in order to file the Opening Brief in support	
 17 18 19 20 21 22 23 24 25 	counsel, William H. Gamage, Esq. of Gamag of Time to File Opening Brief And Appendix based upon all papers and pleadings on file wi authorities, along with any oral argument deer <u>MEMORANDUM OF P</u> Appellant requests an extension of 10 thereof based upon the following: 1. On or about September 14, 2013, A Index; 2. On or about October 10, 2013, the St pages;	e & Gamage and makes this Motion For Extension pursuant to NRAP 31. Appellant makes this Motion ith this Court, the below memorandum of points and ned necessary by this Court. OINTS AND AUTHORITIES days in order to file the Opening Brief in support appellant filed his Opening Brief and Appellant's ate filed Respondent's Answering Brief totaling 54	
 17 18 19 20 21 22 23 24 25 26 	 counsel, William H. Gamage, Esq. of Gamag of Time to File Opening Brief And Appendix based upon all papers and pleadings on file will authorities, along with any oral argument deer <u>MEMORANDUM OF P</u> Appellant requests an extension of 10 thereof based upon the following: On or about September 14, 2013, A Index; On or about October 10, 2013, the St 	e & Gamage and makes this Motion For Extension pursuant to NRAP 31. Appellant makes this Motion ith this Court, the below memorandum of points and ned necessary by this Court. OINTS AND AUTHORITIES days in order to file the Opening Brief in support appellant filed his Opening Brief and Appellant's ate filed Respondent's Answering Brief totaling 54	

1	4. The length and number of issues brought by the State in its Response Brief are numerous		
2	and, therefore, require more time and attention than the average appeal;		
3	5. Appellant's Counsel is the co-owner of a law firm with two attorneys and a large		
4			
5	caseload;		
6	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		
7			
8	the State in its brief, Appellant's Counsel believes that he needs 10 more days to revise, provide		
9	proper citations, and edit his brief;8. A grant of a 10 day extension would make Appellant's Reply Brief due on November 22,		
10	2013;		
11	9. This Motion is submitted in accordance with the requirements of NRAP 31(b)(3). Further,		
12			
13	this request for extension is not made for any undue purpose such as to prejudice any party or to improperly delay these proceedings.		
14	DATED THIS 12th day of November, 2013.		
15	GAMAGE & GAMAGE		
16	/s/ William H. Gamage, Esq.		
17	William H. Gamage, Esq.		
18	Nevada Bar No. 009024 5580 South Fort Apache Street, Suite 110		
19	Las Vegas, Nevada 89148 Telephone: (702) 386-9529		
20	Facsimile: (702) 382-9529		
21	Attorneys for Appellant		
22			
23			
24			
25			
26			
27			
28			
	Page 2 of 4		

1	DECLARATION OF WILLIAM H. GAMAGE, ESQ.			
2	COUNTY OF CLARK)			
3	STATE OF NEVADA) ss:			
4	I, William H. Gamage, Esq, being duly sworn deposes and states under penalty of perjury			
5	that I am above the age of 18 years and offer the following information for which I am competent			
6 7	to testify:			
/ 8	1.	I am a Nevada licensed attorney certified to practice in all Nevada Courts.		
9	2.	That I was appointed to represent Rickie Slaughter in his above titled appeal.		
10				
11	3.	On or about September 14, 2013, Appellant filed his Opening Brief and		
12		Appellant's Index;		
13	4.	On or about October 10, 2013, the State filed Respondent's Answering Brief totaling 54 pages;		
14	5.	Appellant's Reply Brief is due November 12, 2013;		
15	6.	The length and number of issues brought by the State in its Response Brief are		
16		numerous and, therefore, require more time and attention than the average appeal;		
17	7.	Appellant's Counsel is the co-owner of a law firm with two attorneys and a large		
18 10		caseload;		
19 20	8.	Appellant's Counsel has completed a substantive draft of this brief;		
20 21	9.	Because of Appellant's Counsel's caseload and the complexity of the issues		
22		brought by the State in its brief, Appellant's Counsel believes that he needs 10		
23		more days to revise, provide proper citations, and edit his brief;		
24	10.	A grant of a 10 day extension would make Appellant's Reply Brief due on		
25		November 22, 2013;		
26				
27	/ / /			
28				
		Page 3 of 4		

1 2 3	 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. 			
4 5				
5 6	FURTHER DECLARANT SAYETH NAUGHT			
7	/s/ William H. Gamage			
8				
9	William H. Gamage, Esq.			
10	CERTIFICATE OF SERVICE			
11	I hereby certify that on the 12th day of November, 2013, I served a true and correct copy			
12	of the above and foregoing Motion For Extension of Time to File Opening Brief And			
13	Appendix (First Request) via first-class mail, postage prepaid, addressed to the following:			
14	STEVEN B. WOLFSON CATHERINE CORTEZ MASTRO			
15	District Attorney's Office State Attorney General's Office			
16	200 E. Lewis Ave.100 North Carson StreetLas Vegas, NV 89011Carson City, Nevada 89701-4717			
17	RICKIE SLUAGHTER JR.			
18	#85902 22010 Cold Creek Road			
19	Indian Springs, Nevada 89070			
20				
21	/s/ William H. Gamage, Esq.			
22	Employee of GAMAGE & GAMAGE			
23				
24				
25				
26				
27				
28				
	Page 4 of 4			