1	IN THE SUPREME COURT OF THE STATE OF NEVADA	
2		
3	ANTHONY CASTANEDA,)	
4	Appellant,) Electronically Filed Appellant,) Case No. 6451 Tracio K. Lindoman	m
5	i racie N. Lindeman	
6)	ırt
7	THE STATE OF NEVADA,)	
8	Respondent.)	
10	APPELLANT'S MOTION FOR EXTENSION OF TIME	
11	TO FILE OPENING BRIEF	
12	Comes Now Appellant ANTHONY CASTANEDA, by and through	i i
13	Deputy Public Defender AUDREY M. CONWAY, and moves for an extension of nine	1
14	working days from May 19, 2014, through and including June 2, 2014, within which to)
15		-
16	file the Opening Brief in this case. The details of this motion are explained in the	1
17	attached Declaration of counsel.	
18	DATED this 19 th day of May, 2014.	
19 20	PHILIP J. KOHN	
21	CLARK COUNTY PUBLIC DEFENDER	
22	By <u>/s/ Audrey M. Conway</u>	
23	AUDREY M. CONWAY, #5611 Deputy Public Defender	i
24	- · r · · · v	
25		
26		
27		
28		

DECLARATION OF AUDREY M. CONWAY

- 1. I am an attorney licensed to practice law in the State of Nevada; I am a deputy public defender assigned to handle the appeal of this matter; I am familiar with the procedural history of this case.
- 2. After granting the defense motion for full briefing, this Court generously granted a ninety-day extension of time in which to prepare the Opening Brief. After a seven-day trial, Mr. Castaneda was convicted of fifteen felony counts of possession of visual presentations depicting sexual conduct of a child. He was sentenced to a suspended sentence of 28-72 months and placed on probation for five years, with the condition of lifetime supervision. The appellate appendix consists of eight volumes and 1,698 pages. Although the brief is near completion, I am respectfully requesting an additional extension of nine working days to complete the Opening Brief.
- 3. Although I requested copies of all court exhibits and trial exhibits from the Evidence Vault in the District Court, I recently realized that several items had not been provided. Upon realizing that these exhibits were missing, I requested that the trial attorneys forward all trial files and materials to the appellate unit. If the missing exhibits are not in the trial files, which I am currently reviewing, I will need to make arrangements to view these items at the Evidence Vault. In an abundance of caution, I am requesting nine additional working days to allow sufficient time for receipt and review of these materials, and for any additional research or modification of the Opening Brief that may result from review of these items.

1	4. Since filing my initial motion for an extension of time in the instant case
2	on February 11, 2014, I have filed the following briefs with this Court: on May 12, 2014,
3	I filed a Fast Track Statement in Case No. 65047; on March 20, 2014, I filed a fifty-one
5	page Opening Brief in Case No. 63069; on February 18, 2014, I filed a Fast Track
6	Statement in Case No. 64477; and on February 18, 2014, I filed a Reply in Case No.
7	·
8	64200.
9	5. I have spoken with the client about his appeal and he understands and
10	supports the need for additional time to insure that all issues are thoroughly researched
11	and briefed. This request for extension of time is made in good faith and not for the
12 13	purposes of delay. It is the best professional judgment of the undersigned that this
14	extension is crucial to the perfection of this appeal and to the provision of effective
15	assistance of counsel to this client.
16	I declare under penalty of perjury that the foregoing is true and correct.
17	
18	EXECUTED on the 19 th of May, 2014.
19	/s/ Audrey M. Conway
20	AUDREY M. CONWAY
21	
22	
23	
24	
25 26	
20 27	
28	
	II

CERTIFICATE OF SERVICE I hereby certify that this document was filed electronically with the Nevada Supreme Court on the 19th day of May, 2014. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows: AUDREY M. CONWAY CATHERINE CORTEZ MASTO HOWARD S. BROOKS STEVEN S. OWENS I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage pre-paid, addressed to: ANTHONY CASTANEDA, 370 East. Harmon #H-305, Las Vegas, NV 89169. BY /s/ Carrie M. Connolly Employee, Clark County Public Defender's Office