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IN THE SUPREME COURT OF THE STATE OF NEVADA

RONALD ERNEST LAKEMAN,)	Supreme Court No. 64609
)	District Court Case: C265107
Appellant,)	
)	
vs.)	
)	
THE STATE OF NEVADA,)	
)	
Respondent.)	

MOTION FOR EXTENSION OF TIME TO FILE OPENING BRIEF

Appellant, Ronald Lakeman, by and through his attorney of record Frederick A. Santacroce, Esq., respectfully moves this Court for an extension of time within to file Appellant's Opening Brief.

This Motion is made and based upon NRAP 27 and NRAP 31(b)(3), the declaration of Frederick A. Santacroce, Esq. filed herewith, and the points and Authorities herein.

Dated this 8th day of May, 2014.

/s/ Frederick A. Santacroce

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POINTS AND AUTHORITIES

NRAP 31(b) provides that a motion for extension of time for filing a brief may be made no later than the due date for the brief and must comply with the provisions NRAP Rules 27 and 31.

On January 27, 2014, an Order removing the case from the Fast Track Program set a due date of May 28, 2014, for the Opening Brief. No extension of time to file the Opening Brief has been previously sought or granted.

Appellant seeks an extension of 120 days for the filing of the Opening Brief which would result in a due date of September 25, 2014.

Appellant requests an extension of time based on the following: 1) due to its length, Appellant did not receive the transcript until March 12, 2014; 2) due to the length of the trial, the transcript exceeds 12,400 pages; 3) the legal and factual issues are complex; and 4) Mr. Santacroce is scheduled for surgery on May 12, 2014. His expected recovery time is six to eight weeks.

For the forgoing reasons, counsel for the Appellant respectfully requests that he be granted an extension of 120 days to file the Opening Brief.

Dated this 8th day of May, 2014.

/s/ Frederick A. Santacroce

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I, Frederick A. Santacroce, under penalty of perjury declares as follows:

2. This is the first request for an extension of time to file the Opening Brief. On December 17, 2013, the rough draft transcript was ordered. Due to the length of the trial, the transcript was not completed and received by me until March 17, 2014.

4. That this motion is made in good faith and not for purposes of delay.

/s/ Frederick A. Santacroe
FREDERICK A. SANTACROE

I hereby certify that this document was filed electronically with the Nevada Supreme Court on May 9, 2014. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Dated this 9th day of May, 2014.

/s/ Melissa Davis
On Behalf of Santacroce Law Offices, Ltd.