

IN THE SUPREME COURT OF THE STATE OF NEVADA

DEANGELO R. CARROLL,) No. 64757

Appellant,)

v.)

THE STATE OF NEVADA,)

Respondent.)
_____)

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Tracie K. Lindeman
Clerk of Supreme Court

MOTION FOR EXTENSION OF TIME
TO FILE THE OPENING BRIEF
(First Request)

Pursuant to NRAP 26(b)(1)(A) and 31(b)(3), appellant DeAngelo R. Carroll moves for a 60-day extension of time to file the opening brief. This is Carroll's first request for an extension. The opening brief is currently due May 8, 2014. *See* NRAP 31(a)(1)(A). If this motion is granted, the brief will be due July 7, 2014.

Supporting Memorandum

Appellate counsel for Carroll did not represent him in the district court proceedings. Therefore, he must become thoroughly familiar with the facts and the legal issues in this case in order to competently represent Carroll on appeal.

This is a large/voluminous first-degree murder case, involving six

(6) defendants. Carroll's case went to trial. The district court record consists of about 757 filings. The file materials counsel received from Carroll's attorneys in the district court proceedings consists of 5 bankers boxes. Furthermore, counsel received some of the transcripts he requested for this appeal on or about March 24, 2014, others he did not receive until April 21, 2014 and May 7, 2014, and he's still missing two transcripts from hearings reported by Joe D'Amato on 8/4/2005 and 12/5/2005.

Counsel has not had sufficient time to review all of the materials and transcripts in order to determine what issues need to be raised on appeal, and those that should be raised to prevent possible procedural and/or exhaustion issues in future post-conviction proceedings should those be necessary. He therefore needs more time to complete his review, research and analyze possible appealable issues, and prepare the opening brief and appendix.

For these reasons, counsel respectfully requests the court grant this motion for a 60-day extension of time to file the opening brief. The

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brief will then be due July 7, 2014.

DATED: May 8, 2014.

/s/ Mario D. Valencia
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY AND AFFIRM that this document was filed electronically with the Nevada Supreme Court on May 8, 2014.

Electronic service of the foregoing document shall be made in accordance with the Master Service List as follows:

CATHERINE CORTEZ MASTO
Nevada Attorney General

STEVEN OWENS
Chief Deputy District Attorney

/s/ Mario D. Valencia
MARIO D. VALENCIA