

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

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

Pursuant to NRAP 26(b)(1)(A) and 31(b)(3), appellant Deangelo R. Carroll moves for a 30-day extension of time to file the reply brief. This is Carroll's first request for an extension. The reply brief is currently due March 6, 2015. If this motion is granted, it will be due Monday, April 6, 2015.

Supporting Memorandum

This motion is unopposed. Counsel for Carroll has discussed the motion and the reasons for the extension with Chief Deputy District Attorney, Jonathan E. VanBoskerck, counsel for the State of Nevada, and he has no objection to this request for a 30-day extension of time to

file the reply brief.

The court is well aware that this is a voluminous case, factually and legally complex. The opening brief is 18,986 words long (about 97 pages). There are 12 volumes to the appendix. And, the State's answering brief is 14,986 words long (about 63 pages).

The State's answering brief was filed on February 4, 2015, so the reply brief is currently due March 6, 2015. I (counsel for Mr. Carroll) have read through the answering brief and have started going through many references made in the brief to the record (appendix). I have started reviewing the cases and legal authority cited in the answering brief. I also have started drafting portions of the reply brief but cannot get it done by tomorrow (March 6, 2015).

I've been battling some health issues. I had an appointment with my cardiologist last week, and I have an appointment tomorrow afternoon for lab work and then follow up with my hematologist. I have not felt 100% lately and with the other professional obligations I've had I just haven't been able to finish drafting the reply brief.

I strongly believe, absent unforeseen circumstances, that I can

finish the reply brief in the next 30 days.

Conclusion

For these reasons, Carroll respectfully requests the court grant this unopposed motion and give him an additional 30 days to file the reply brief, up to and including Monday, April 6, 2015.

DATED: March 5, 2015.

/s/ Mario D. Valencia
MARIO D. VALENCIA
Nevada Bar No. 6154
1055 Whitney Ranch Dr., Ste. 220
Henderson, NV 89014
(702) 940-2222
Counsel for Mr. Carroll

CERTIFICATE OF SERVICE

I HEREBY CERTIFY AND AFFIRM that this document was filed electronically with the Nevada Supreme Court on March 5, 2015.

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
JONATHAN E. VANBOSKERCK
Chief Deputy District Attorneys

/s/ Mario D. Valencia
MARIO D. VALENCIA