

1 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

2 *****

3 DONTE JOHNSON

4 Appellant,

5 vs.

6 THE STATE OF NEVADA,

7 Respondent.

S.C. CASE NO. 65168

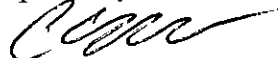
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Jul 07 2014 03:58 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

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9 **MOTION FOR EXTENSION OF TIME TO FILE OPENING BRIEF**

10 COMES NOW, Christopher R. Oram, Esq., attorney for Appellant, DONTE JOHNSON,
11 and kindly moves this Court for an Order granting an extension of time of ninety (90) days from
12 the date the Opening Brief is now due, to wit: July 7, 2014, and extend the time to and including,
13 October 6, 2014, for the filing of the Opening Brief. This motion is made and based upon NRAP
14 27 and 31(a), the Affidavit of Christopher R. Oram, Esq., filed herewith, and the Points and
15 Authorities attached hereto.

16 DATED this 7th day of July, 2014.

17 Respectfully submitted by:

18 
19 CHRISTOPHER R. ORAM, ESQ.
20 Nevada Bar No. 004349
21 520 S. Fourth Street, 2nd Floor
22 Las Vegas, Nevada 89101
23 (702) 384-5563

24 Attorney for Appellant
25 DONTE JOHNSON
26
27
28

CHRISTOPHER R. ORAM, LTD.
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LAS VEGAS, NEVADA 89101
TEL. 702.384-5563 | FAX. 702.974-0623

1 **POINTS AND AUTHORITIES**

2 Time for Serving and Filing Briefs.

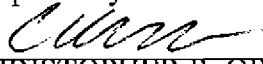
3 The appellant shall serve and file the OPENING brief within one
4 hundred and twenty (120) days after the date on which the appeal is
5 docketed in the Supreme Court. The respondent shall serve and file
6 his answering brief within thirty (30) days after service of the brief
7 of the appellant. After service of respondent's brief, any OPENING
8 brief must be served and filed within thirty (30) days. . . . By written
9 stipulation timely filed with the Supreme Court, the parties may
10 extend the time for filing any brief for a total of thirty (30)
11 additional days unless the court otherwise orders. Applications for
12 extensions of time beyond that to which the parties are permitted to
13 stipulate are not favored, and will be considered only on motion for
14 good cause clearly shown, or ex parte in cases of extreme and
15 unforeseeable emergency. The Supreme Court may shorten the
16 periods prescribed above for serving and filing briefs, either by rule
17 for all cases or for classes of cases, or by order for specific cases."

11 The Opening Brief and appendix is due on July 7, 2014. This is the first request for an
12 extension of time. The undersigned is requesting (90) ninety days to prepare the Opening Brief
13 and Appendix. It is essential the undersigned be given additional time as Mr. Johnson is facing a
14 sentence of death. Mr. Johnson has numerous complex and essential issues that must be
15 presented. There were numerous supplemental briefs filed in the district court. Therefore, it is
16 essential the undersigned be permitted more time.

17 Therefore, counsel respectfully request that this Court permit him ninety (90) days, to wit:
18 October 6, 2014, in order to prepare and submit the Opening Brief and appendix.

19 DATED this 7th day of July, 2014.

20 Respectfully submitted by:

21 
22 CHRISTOPHER R. ORAM, ESQ.
23 Nevada Bar #004349
24 520 S. Fourth Street, 2nd Floor
25 Las Vegas, Nevada, 89101

26 Attorney for Appellant
27 DONTÉ JOHNSON
28

AFFIDAVIT OF CHRISTOPHER R. ORAM
IN SUPPORT OF MOTION FOR EXTENSION OF TIME
TO FILE OPENING BRIEF

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

CHRISTOPHER R. ORAM, ESQ., being first duly sworn, deposes and states:

1. I am an attorney duly licensed to practice law in the State of Nevada. I am counsel for the Appellant in the above-entitled matter. I have personal knowledge of all matters contained herein and am competent to testify thereto.

2. The Opening Brief and appendix is due on July 7, 2014. This is the first request for an extension of time. The undersigned is requesting (90) ninety days to prepare the Opening Brief and Appendix. It is essential the undersigned be given additional time as Mr. Johnson is facing a sentence of death. Mr. Johnson has numerous complex and essential issues that must be presented. There were numerous supplemental briefs filed in the district court. Therefore, it is essential the undersigned be permitted more time.

Therefore, counsel respectfully request that this Court permit him ninety (90) days, to wit: October 6, 2014, in order to prepare and submit the Opening Brief and appendix.

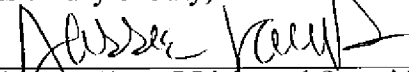
3. That this motion is made in good faith and not for purposes of delay.

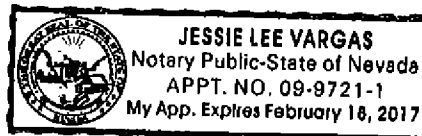
FURTHER YOUR AFFIANT SAYETH NAUGHT.

DATED this 7th day of July, 2014.


CHRISTOPHER R. ORAM, ESQ.

SWORN and SUBSCRIBED before me
this 7th day of July, 2014.


NOTARY PUBLIC in and for said
County and State



CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on July 7, 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

STEVE OWENS
Chief Deputy District Attorney

CHRISTOPHER R. ORAM, ESQ.

BY:

/s/ Jessie Vargas
An Employee of Christopher R. Oram, Esq.