

IN THE SUPREME COURT OF THE STATE OF NEVADA

\* \* \* \* \*

DONTE JOHNSON

Appellant,

vs.

THE STATE OF NEVADA,

Respondent.

S.C. CASE NO. 65168 Electronically Filed  
Jun 08 2015 11:58 a.m.  
Tracie K. Lindeman  
Clerk of Supreme Court

**MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF**

COMES NOW, Christopher R. Oram, Esq., attorney for Appellant, DONTE JOHNSON ,  
and kindly moves this Court for an Order granting an extension of time of sixty (60) days from the  
date the Reply Brief is now due, to wit: June 8, 2015, and extend the time to and including,  
August 7, 2015, for the filing of the Reply Brief. This motion is made and based upon NRAP 27  
and 31(a), the Affidavit of Christopher R. Oram, Esq., filed herewith, and the Points and  
Authorities attached hereto.

DATED this 8<sup>th</sup> day of June, 2015.

Respectfully submitted by:



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

Attorney for Appellant  
DONTE JOHNSON

1 **POINTS AND AUTHORITIES**


2 The Reply Brief is currently due on June 8, 2015. This is the first request for an extension  
3 of time. The undersigned is requesting sixty (60) days to prepare the Reply Brief. It is essential the  
4 undersigned be granted additional time. As the instant case is capital, the case is complex and  
5 voluminous.

6 In the instant case, the State's Answering Brief was 151 pages. The undersigned's  
7 Opening Brief was similarly voluminous. This case is capital and the issues extremely complex.  
8 Therefore it is essential the undersigned be permitted more time to review the State's Answering  
9 Brief and draft the Reply Brief.

10 Therefore, counsel respectfully request that this Court permit him sixty (60) days, to wit:  
11 August 7, 2015, in order to prepare and submit the Reply Brief.

12 DATED this 8<sup>th</sup> day of June, 2015.

13 Respectfully submitted by:

14   
15 CHRISTOPHER R. ORAM, ESQ.  
16 Nevada Bar #004349  
17 520 S. Fourth Street, 2nd Floor  
18 Las Vegas, Nevada, 89101

19 Attorney for Appellant  
20 DONTE JOHNSON  
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**AFFIDAVIT OF CHRISTOPHER R. ORAM**  
**IN SUPPORT OF MOTION FOR EXTENSION OF TIME**  
**TO FILE REPLY BRIEF**

STATE OF NEVADA        }  
COUNTY OF CLARK       } ss:

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 Reply Brief is currently due on June 8, 2015. This is the first request for an extension of time. The undersigned is requesting sixty (60) days to prepare the Reply Brief. It is essential the undersigned be granted additional time. As the instant case is capital, the case is complex and voluminous.

In the instant case, the State's Answering Brief was 151 pages. The undersigned's Opening Brief was similarly voluminous. This case is capital and the issues extremely complex. Therefore it is essential the undersigned be permitted more time to review the State's Answering Brief and draft the Reply Brief.

Therefore, counsel respectfully request that this Court permit him sixty (60) days, to wit: August 7, 2015, in order to prepare and submit the Reply Brief.

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

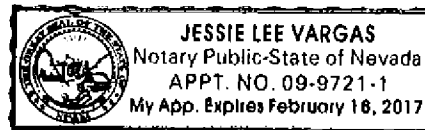
FURTHER YOUR AFFIANT SAYETH NAUGHT.

DATED this 8<sup>th</sup> day of June, 2015.

  
CHRISTOPHER R. ORAM, ESQ.

SWORN and SUBSCRIBED before me  
this 8<sup>th</sup> day of June, 2015.

  
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 June 8, 2015. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

ADAM PAUL LAXALT  
Nevada Attorney General

STEVE OWENS  
Chief Deputy District Attorney

CHRISTOPHER R. ORAM, ESQ.

BY:

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