

IN THE SUPREME COURT OF THE STATE OF NEVADA

* * * * *

DONTE JOHNSON

Appellant,

vs.

THE STATE OF NEVADA,

Respondent.

S.C. CASE NO. 65168

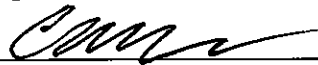
Electronically Filed
Aug 07 2015 09:51 a.m.
Tracie K. Lindeman
Clerk of Supreme Court

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: August 7, 2015, and extend the time to and including,
October 6, 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 7th day of August, 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 August 7, 2015. This is the second request for an
3 extension of time. The undersigned is requesting an additional sixty (60) days to review the
4 voluminous record, briefs, and to draft the Reply Brief. It is essential the undersigned be granted
5 additional time. As the instant case is capital, the case is complex and 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 and the record massive. Due to the voluminous nature of the briefs and the record, it is extremely
9 necessary the undersigned be granted this additional extension so ample time may be devoted to
10 the reply brief.

11 Additionally, the undersigned's only paralegal is on vacation from July 31, 2015, through
12 August 10, 2015. Thus, for the aforementioned reasons, the extension of time is extremely
13 needed.

14 Therefore, counsel respectfully request that this Court permit him sixty (60) days, to wit:
15 October 6, 2015, in order to prepare and submit the Reply Brief.

16 DATED this 7th day of August, 2015.

17 Respectfully submitted by:

18 

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

23 Attorney for Appellant
24 DONTÉ JOHNSON
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26
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AFFIDAVIT OF CHRISTOPHER R. ORAM
IN SUPPORT OF MOTION FOR EXTENSION OF TIME
TO FILE REPLY 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 Reply Brief is currently due on August 7, 2015. This is the second request for an extension of time. The undersigned is requesting an additional sixty (60) days to review the voluminous record, briefs, and to draft the Reply Brief. It is essential the undersigned be granted additional time. As the instant case is capital, the case is complex and voluminous.

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Additionally, the undersigned's only paralegal is on vacation from July 31, 2015, through August 10, 2015. Thus, for the aforementioned reasons, the extension of time is extremely needed.

Therefore, counsel respectfully request that this Court permit him sixty (60) days, to wit: October 6, 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.

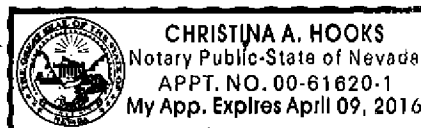
FURTHER YOUR AFFIANT SAYETH NAUGHT.

DATED this 7th day of August, 2015.


CHRISTOPHER R. ORAM, ESQ.

SWORN and SUBSCRIBED before me
this 7th day of August, 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 August 7, 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/ Bridget Ortiz
An Employee of Christopher R. Oram, Esq.