

IN THE SUPREME COURT OF THE STATE OF NEVADA

MICHAEL J. SCHOFIELD,

Appellant,

vs.

STATE OF NEVADA,

Respondent.

Electronically Filed
Sep 14 2015 02:18 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

Case No. 65193

(District Court Case No. C-13-287009-1)

APPELLANT'S MOTION TO EXTEND TIME TO FILE REPLY BRIEF

Comes Now Appellant Michael J. Schofield, by and through his attorney, Karen K. Wong, and moves for a twenty-one (21) day extension of time, up to and including October 5, 2015, in which to file the reply brief in this case. The brief was originally due to be filed on September 4, 2015, and the time for filing was extended by telephonic extension to September 14, 2015. This Motion is based upon the attached Declaration of counsel.

Dated this 14th day of September, 2015.

/s/ Karen K. Wong

Karen K. Wong
Nevada Bar No. 13284
Wong Appellate Law
9484 S. Eastern Ave., #408
Las Vegas, NV 89123
Phone: (702) 830-6080
Attorney for Appellant

DECLARATION OF KAREN K. WONG

1. I am an attorney licensed to practice law in the State of Nevada.
2. I was appointed as counsel for Appellant for purposes of this appeal.
3. I initially requested a five-day telephonic extension of time to file the Reply Brief in order to provide me time for additional research and to consolidate that research into the brief.
4. Last week, I unexpectedly received placement of a newborn for adoption. Because of the sudden and unexpected nature of the placement, completion of paperwork, preparation of the home, and the newborn's schedule have consumed time I expected to spend on the Reply Brief.
5. I expect the newborn's needs requiring my attention to significantly reduce my availability to work on the Reply Brief over the next several weeks.
6. Accordingly, I am requesting a twenty-one (21) day extension of time within which to file a file the Reply Brief.
7. This Motion to Extend Time is made in good faith and not for the purpose of delay.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 14th day of September, 2015.

/s/ Karen K. Wong
KAREN K. WONG

CERTIFICATE OF SERVICE

I hereby certify that, on September 14, 2015, I served a copy of the foregoing document by electronically filing the document using the Nevada Supreme Court's Electronic Filing System, upon the following counsel of record:

Adam Paul Laxalt

Steven S. Owens

Jonathan VanBoskerck

/s/ Karen K. Wong

Karen K. Wong
Wong Appellate Law