DRUMMOND LAW FIRM 228 South Fourth St., First Floor Las Vegas, NV 89101

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MEMORANDUM

I, CRAIG W. DRUMMOND, ESQ., am a duly qualified, practicing and licensed attorney in the State of Nevada and State of Missouri and appointed counsel for Defendant DONALD TAYLOR in the above-captioned case. Appellant's counsel submits his first request for a fifteen (15) day extension of time in which to file Appellant's Reply Brief.

This is an appeal from a Judgment of Conviction for which Appellant is serving a life sentence. Appellant filed a Notice of Appeal on April 4, 2014 and Case Appeal Statement on April 8, 2014. The Appendix was filed on November 5, 2014, the Opening Brief on November 13, 2014 and the Respondent's Answering Brief was filed on December 16, 2014.

This request is being made in order for the Appellant and counsel to confer regarding the contents of the Reply Brief. The Appellant is incarcerated in Ely, Nevada which makes most communications of written documents through the U.S. Mail. This brief extension of time in order for the Appellant to receive a draft of the Reply Brief, review it, and consult with counsel prior to filing the final document. Appellant has taken an active interest in his appeal and requests this time to confer with counsel.

Pursuant to NRAP 26(b), this Court for good cause shown can enlarge the time prescribed by the Nevada Rules of Appellate Procedure to perform any act, or may permit an act to be done after the expiration of such time. This case involves complex issues in which Appellant is serving a life sentence for which a detailed review is required. Further, time is needed because the Appellant is in custody in Ely, Nevada.

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review the issues in his Reply Brief.

Appellant respectfully moves for an enlargement of time of fifteen (15) days, making said brief and appendix due January 30, 2015. This will give Appellant sufficient time to thoroughly

DATED this 9 day of January, 2015.

DRUMMOND LAW FIRM

DRUMMOND, ESQ.

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Attorney for Appellant Donald Taylor

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CERTIFICATE OF SERVICE

I hereby certify that on this _____ day of January, 2015, service of a true and correct copy of the foregoing MOTION FOR ENLARGEMENT OF TIME (First Request) was duly made by First Class Mail, postage prepaid from Las Vegas, Nevada, to the address below.

OFFICE OF THE DISTRICT ATTORNEY

Criminal Law Division

200 Lewis Avenue

Las Vegas, NV. 89101

Counsel for the State of Nevada

High Desert State Prison Inmate Donald Taylor, #1117274 P.O. Box 650 Indian Springs, NV 89070 Appellant

An Employee of DRUMMOND LAW FIRM