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Tracie K. Lindeman  
Clerk of Supreme Court

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

11 \* \* \* \* \*

12 DONALD TAYLOR,

13 Appellant,

14 vs.

15 THE STATE OF NEVADA,

16 Respondent.

Supreme Court No. 65388  
District Case No.: C270343-1

17 **MOTION FOR ENLARGEMENT OF TIME**

18 (Second Request)

19 COMES NOW Appellant, DONALD TAYLOR, by and through his attorney of record,  
20 CRAIG W. DRUMMOND, ESQ. of the DRUMMOND LAW FIRM, and moves this Court for an  
21 enlargement of time of ten (10) days from January 30, 2015 making the Reply Brief due February  
22 13, 2015. This motion is based on the following memorandum and all papers and pleadings on file  
23 herein.

24 DATED this 29 day of January 2015.

25 DRUMMOND LAW FIRM

26 By

27 CRAIG W. DRUMMOND, ESQ.

28 Nevada Bar No. 011109

228 South Fourth St., First Floor

Las Vegas, NV 89101

Attorney for Appellant Donald Taylor

**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 second request for a ten (10) 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. A draft of the Reply Brief has been mailed to Mr. Taylor twice, but Appellant has yet to receive it in Ely State Prison. 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 upon receipt of the draft copy of his Reply Brief.

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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1 Appellant respectfully moves for an enlargement of time of ten (10) days, making said  
2 Reply Brief due February 13, 2015. This will give Appellant sufficient time to receive the draft  
3 copy and thoroughly review the issues in his Reply Brief with his attorney.

4 DATED this 29 day of January, 2015.

5 DRUMMOND LAW FIRM

6  
7 By

8   
CRAIG W. DRUMMOND, ESQ.

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11 Las Vegas, NV 89101

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13 *Attorney for Appellant Donald Taylor*  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 29 day of January, 2015, service of a true and correct copy of the foregoing MOTION FOR ENLARGEMENT OF TIME (Second 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*

Ely State Prison  
Inmate Donald Taylor, #1117274  
P.O. Box 1989  
Ely, NV 89301  
*Appellant*

  
An Employee of DRUMMOND LAW FIRM