

1 IN THE SUPREME COURT OF THE STATE OF NEVADA

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3
4 SIAOSI VANISI,
5 Appellant,

No. 65774

Electronically Filed
Jul 06 2015 02:49 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

6 vs.

7 RENEE BAKER, WARDEN, and
8 ADAM PAUL LAXALT,
9 ATTORNEY GENERAL FOR
THE STATE OF NEVADA,

10 Respondents.

11 REQUEST FOR EXTENSION OF TIME WITHIN WHICH TO FILE
12 APPELLANT'S REPLY BRIEF

13 Appellant Siaosi Vanisi, through counsel, hereby requests an
14 extension of time of twenty-eight (28) days, to and including August 3,
15 2015 within which to file his reply brief. SCR 250 (7)(d); NRAP
16 31(a)(4), (b)(3). This request is supported by the attached declaration
17 of counsel.

18 Dated this 6th day of July, 2015.

19
20 RENE L. VALLADARES
Federal Public Defender

21
22 TIFFANI D. HURST
Supervising Assistant Federal Defender
Nevada Bar No. 11027C
23 411 E. Bonneville, Suite 250
Las Vegas, Nevada 89101
24 (702) 388-6577
tiffani_hurst@fd.org

25 Attorneys for Appellant
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1 **DECLARATION OF TIFFANI D. HURST**

2 I, Tiffani D. Hurst, declare as follows:

3 1. I am an attorney at law, admitted to practice before this
4 Court, employed as a Supervising Assistant Federal Public Defender. I
5 represent the appellant Siaosi Vanisi in this capital case.

6 2. Mr. Vanisi's Reply Brief is currently due on July 6, 2015.
7 Counsel seeks an extension of time of twenty-eight (28) days, up to and
8 including August 3, 2015, to file and serve the reply brief.

9 3. Since the first extension was granted, I was required to
10 spend several days attending my seven-year-old daughter, whose
11 illness led to a surgical procedure, and several emergency room visits.
12 Further, she is scheduled for another medical procedure where she will
13 be hospitalized in Los Angeles from July 20, 2015, through, at
14 minimum, July 23, 2015.

15 4. Additionally, I drafted most, and in some cases all, of the
16 following pleadings filed: on May 29, 2015, an Opposition to Motion to
17 Dismiss and Motion for an Evidentiary hearing in Castillo v. Baker,
18 No.2:04-cv-00868-RCJ-GWF, U.S. District Court; on June 4, 2015, an
19 Opening Brief in Moore v. Baker, No. 66652, Nevada Supreme Court;
20 on June 12, 2015, a reduced size Reply Brief in Williams v. Baker, No.
21 13-99002, Ninth Circuit; on June 15, 2015, a Surreply to Reply to
22 Opposition to Motion to Dismiss and Reply to Opposition to Motion for
23 Evidentiary Hearing in Paine v. Baker, No. 2:00-cv-01082-MMD-VCF,
24 U. S. District Court; on June 22, 2015, a Third Amended Petition for
25 Habeas Corpus in Hernandez v. Baker, No. 3:09-cv-00545-LRH-RAM,
26 U.S. District Court; and on June 30, 2015, a Petition for Habeas

Corpus in Walker v. Baker, No. 2:15-cv-01240-RFB-GWF, U.S. District Court.

5. I also have had to fulfill administrative duties including, but not limited to, a planning committee for, and attendance at a conference which occurred on June 23, 2015 through June 26, 2015, and attendance at an upcoming training on July 8, 2015, through July 12, 2015.

6. Further, I have the following pending deadlines which require my attention, in addition to Mr. Vanisi's reply brief: July 10, 2015, Second Amended Petition in Blake v. Baker, No. 3:09-cv-00327-RCJ-WGC, U.S. District Court; August 5, 2015, Reply to Opposition to Motion for Evidentiary hearing in McNelson v. Baker, No. 2:00-cv-00284-RCJ-CWH, U.S. District Court; August 7, 2015, Opening Brief in Bollinger v. Baker, No. 15-99007, Ninth Circuit; and September 4, 2015, Opening Brief in Floyd v. Baker, No. 14-99012, Ninth Circuit.

7. In light of the above circumstances, I seek on Mr. Vanisi's behalf an extension until August 3, 2015.

8. This request is not made solely for the purpose of delay, or for any other improper purpose, but only to ensure that this office provides competent representation to Mr. Vanisi. Nev. R. Prof. Conduct 1.1.

9. I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on July 6, 2015 in Las Vegas, Nevada.

/s/ Tiffani D. Hurst
Tiffani D. Hurst
Supervising Assistant Federal Defender

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Terrence McCarthy
Washoe County District Attorney
tmccarth@da.washoecounty.us

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