

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

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**RALPH SIMON JEREMIAS**

Electronically Filed  
Jun 13 2016 08:39 a.m.  
Tracie K. Lindeman  
Clerk of Supreme Court

Appellant,

vs.

**THE STATE OF NEVADA**

Respondent.

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**Docket No. 67228**

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Direct Appeal From A Judgment of Conviction  
Eighth Judicial District Court  
The Honorable Valerie Adair, District Judge  
District Court No. 09C256769

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**MOTION FOR EXTENSION OF TIME TO FILE  
REPLY BRIEF (FIRST REQUEST)**

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JoNell Thomas  
State Bar #4771  
Deputy Special Public Defender  
David M. Schieck  
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Attorneys for Jeremias

**Motion for Extension of Time to File Reply Brief (First Request)**

COMES NOW, Appellant, Ralph Jeremias, by and through his attorneys David M. Schieck, Special Public Defender, and JoNell Thomas, Deputy Special Public Defender, and respectfully moves this Honorable Court for an extension of time of 30 days, up to and including July 13, 2016, to file Appellant's Reply Brief.

This Motion is made and based upon the Points and Authorities contained herein, and Declaration attached hereto.

DATED this 10<sup>th</sup> day of June, 2016.

SUBMITTED BY:

DAVID M. SCHIECK  
SPECIAL PUBLIC DEFENDER

*/s/ JONELL THOMAS*

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JONELL THOMAS  
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Attorney for Appellant

## STATEMENT OF FACTS

Appellant's Reply Brief is due June 13, 2016. Based on the reasons set forth in counsel's declaration, an extension of 30 days is requested to file the Reply Brief.

## POINTS AND AUTHORITIES

SCR 250(6(e) states as follows:

“(e) The supreme court may grant an initial extension of time of up to 60 days to file a brief upon a showing of good cause, but shall not grant additional extensions of time except upon a showing of extraordinary circumstances and extreme need.”

Appellant is requesting an extension of 30 days to file the Brief, up to and including July 13, 2016.

DATED this 10<sup>th</sup> day of June, 2016.

SUBMITTED BY:

DAVID M. SCHIECK  
SPECIAL PUBLIC DEFENDER

*/s/ JONELL THOMAS*

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JONELL THOMAS  
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DECLARATION OF JONELL THOMAS

JONELL THOMAS, hereby declares as follows:

I am an attorney duly licensed to practice law in the State of Nevada, and the Deputy Special Public Defender assigned to handle Mr. Jeremias' capital appeal.

The Reply Brief is due June 13, 2016.

The State filed a 95-page Answering Brief, the reply to which requires extensive factual review and legal research. In addition, several recent opinions from the United States Supreme Court may be relevant to issues raised in this appeal and I intend to fully review these decisions. I respectfully request 30 additional days to complete and file the reply brief. This is the first request for an extension of time for the reply brief.

I declare that I make this request in good faith and not for purposes of undue delay.

*/s/ JONELL THOMAS*

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JONELL THOMAS

CERTIFICATE OF SERVICE

The undersigned does hereby certify that on the 10<sup>th</sup> day of June, 2016, a copy of the foregoing Motion for Extension of Time to File Reply Brief (First Request) was served by electronic filing to: Clark County District Attorney's Office and the Nevada Attorney General's Office.

*/s/ JONELL THOMAS*

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JONELL THOMAS