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Electronically Filed
Sep 21 2015 09:24 a.m.
Tracie K. Lindeman
Clerk of Supreme Court

NEVADA SUPREME COURT

BENNETT GRIMES)	
)	Case No.: 67598
Appellant,)	
v.)	MOTION TO EXTEND TIME
)	TO FILE REPLY TO FAST
THE STATE OF NEVADA)	TRACK STATEMENT
)	RESPONSE
Respondent.)	(FIRST REQUEST)
)	

COMES NOW, Appellant BENNETT GRIMES by and through appointed counsel, William H. Gamage, Esq. of Gamage & Gamage and hereby files this MOTION TO EXTEND TIME TO FILE REPLY TO FAST TRACK STATEMENT RESPONSE (FIRST REQUEST). This Motion is made and based upon Rule 26 of the Nevada Rules of Appellate Procedure, all papers on file herein, the attached Declaration of William H. Gamage, Esq., and the following:

1. This motion is made in good faith, and not for purposes of delay.

2. Appellant's Reply to Fast Track Statement Response is due September 18, 2015.

3. On or about August 26, 2015, Counsel for Appellant began moving his office to a new location.

4. Opposing Counsel filed their Fast Track Statement Response on or about September 4, 2015.

5. As Counsel's office was in the process of being dismantled and moved to the new location, over the next 2 weeks, counsel experienced severe set-backs in setting up basic office services such as telephones and internet access.

6. Moving in and setting up new computers, networking, and file systems caused Counsel to experience a work backlog because Counsel had to focus on getting staff with the necessary tools to get back work.

7. Accordingly, good cause appearing and for the reasons stated above and below, counsel requests a 10 day extension of time to

file the Reply to Fast Track Response making it due September 28, 2015.

8. I declare that the above and foregoing statements are true and correct to the best of my knowledge and that these statements are made under penalty of perjury according to the laws of the State of Nevada.

DATED this 18th day of September, 2015.

GAMAGE & GAMAGE

/s/ William H. Gamage, Esq.

William H. Gamage, Esq.
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Attorney for Appellant

CERTIFICATE OF SERVICE

I hereby certify that on 18th day of September, 2015, I served a copy of the foregoing MOTION TO EXTEND TIME TO FILE REPLY TO FAST TRACK STATEMENT RESPONSE (FIRST REQUEST) to each of the parties via the court's electronic service system, and addressed to:

Steven B. Wolfson, Esq.
Clark County District Attorney
200 Lewis Ave.
Las Vegas, Nevada 89155

Adam P. Laxalt
Nevada Attorney General
100 North Carson Street
Carson City, NV 89701

BENNETT GRIMES
Offender No. 1098810
Southern Desert State Prison
22010 Cold Creek Road
Indian Springs, NV 89018

/s/ William H. Gamage, Esq.

Employee of GAMAGE & GAMAGE