

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

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5 LINDSIE NEWMAN,  
6                                   Appellant,  
7                   vs.  
8 THE STATE OF NEVADA,  
9                                   Respondent.

Electronically Filed  
Sep 11 2015 10:39 a.m.  
Case No. 67756  
Tracie K. Lindeman  
67763 Clerk of Supreme Court

10                                   **MOTION TO EXTEND TIME IN WHICH TO FILE**  
11                                   **APPELLANT'S OPENING BRIEF**

12                   Appellant, LINDSIE NEWMAN, through her court-appointed  
13 counsel, Nevada State Public Defender KARIN L. KREIZENBECK, and Chief  
14 Appellate Deputy Public Defender, SALLY DESOTO, moves this Court for a  
15 20-day extension of time until September 30, 2015, within which to file her  
16 opening brief. The opening brief is currently due on September 10, 2015.

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18                   This motion is made pursuant to NRAP 3(C)(h)(2), 26 and 27 and  
19 is based on the following Affidavit of Counsel.

20                   DATED this 10th day of September, 2015.

21                                   KARIN L. KREIZENBECK  
22                                   Nevada State Public Defender

23                                   /s/ SALLY DESOTO  
24                                   Chief Appellate Deputy  
25                                   Bar I.D No. 8790  
26                                   511 East Robinson Street, Suite 1  
27                                   Carson City, Nevada 89701  
28                                   (775) 684-1080

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1 may be assigned to my department. I recently covered five parole revocation  
2 hearings and am being assigned five parole revocations for next week, as well as  
3 three bail hearings in the last two days. I am presently drafting a brief in another  
4 case that requires much more time than I originally anticipated.

5           5. In light of the above, there has not been sufficient opportunity to  
6 complete my work on the opening brief. Accordingly, I am requesting an  
7 extension of time until September 30, 2015, within which to file the opening  
8 brief.

9           6. I would submit that, pursuant to NRAP 3C(h), the factors  
10 outlined above constitute both need and merit for granting an extension of time  
11 within which to file the opening brief.

12           7. This request by the Nevada State Public Defender for an

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1 extension of time for the filing of the opening brief is made for good cause and  
2 not for the purpose of unnecessary delay.

3 DATED this 10<sup>th</sup> day of September, 2015.

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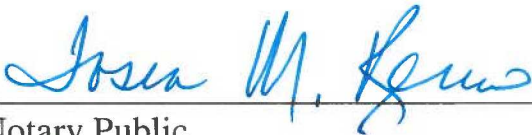
  
SALLY DESOTO

6

7 SUBSCRIBED AND SWORN (or affirmed) to  
8 by SALLY DESOTO before me this  
9 10<sup>th</sup> day of Sept., 2015.

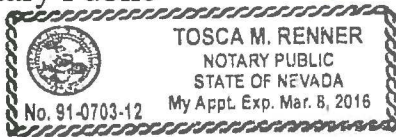
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Notary Public

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ADAM PAUL LAXALT  
NEVADA ATTORNEY GENERAL

SALLY DESOTO  
CHIEF APPELLATE DEPUTY PUBLIC DEFENDER

JASON WOODBURY  
CARSON CITY DISTRICT ATTORNEY

Ms. LINDSIE NEWMAN  
#1136265 - FMWCC  
4370 SMILEY ROAD  
LAS VEGAS NV 89115

SIGNED: /s/ Tosca M. Renner  
Employee of Nevada State Public Defender