1 IN THE SUPREME COURT OF THE STATE OF NEVADA 2 3 **Electronically Filed** 4 Jun 30 2015 10:25 a.m. 5 LINDSIE NEWMAN. Case No. 6775acie K. Lindeman 67161erk of Supreme Court Appellant, 6 VS. 7 THE STATE OF NEVADA, Respondent. 8 9 MOTION TO EXTEND TIME IN WHICH TO FILE 10 APPELLANT'S REPLY 11 Appellant, LINDSIE NEWMAN, through her court-appointed 12 13 counsel, Nevada State Public Defender KARIN L. KREIZENBECK, and Chief 14 Appellate Deputy Public Defender, SALLY DESOTO, moves this Court for a 15 10-day extension of time until July 9, 2015, within which to file her reply brief. 16 17 The reply brief is currently due on June 29, 2015. 18 This motion is made pursuant to NRAP 3(C)(h)(2), 26 and 27 and 19 20 is based on the following Affidavit of Counsel. 21 DATED this 29th day of June, 2015. 22 KARIN L. KREIZENBECK 23 Nevada State Public Defender 24 25 /s/ SALLY DESOTO Chief Appellate Deputy 26 Bar I.D No. 8790 27 511 East Robinson Street, Suite 1 Carson City, Nevada 89701 28 (775) 684-1080

1 AFFIDAVIT OF COUNSEL STATE OF NEVADA) 2 CARSON CITY 3 SALLY DESOTO, being first duly sworn on oath, deposes and 4 says as follows: 5 1. I am the chief appellate deputy with the Nevada State Public 6 Defender, appointed counsel for the appellant. 7 2. The Appellate Division of the Nevada State Public Defender 8 prosecutes appeals, petitions for post-conviction relief, and writs of habeas 9 corpus on behalf of indigent criminal defendants. In addition to handling 10 appeals and post-conviction litigation, the Appellate Division of the Nevada 11 State Public Defender processes and responds to numerous letters from inmates 12 in this and other states. Further, we sometimes are called upon to handle court 13 appearances in various counties at times when trial deputies have scheduling 14 conflicts and during periods of personnel shortage. 15 3. This is an appeal from a Judgment of Conviction entered 16 pursuant to a guilty plea of Conspiracy to Commit Grant Larceny. 17 4. My appellate deputy has recently left the office on maternity 18 eave. I am now covering cases in the Carson City court system as well as 19

working on her appeals caseload, parole revocations, and any other work that

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1	may be assigned to my department.
2	5. In light of the above, there has not been sufficient opportunity to
3	complete my work on the fast track reply. Accordingly, I am requesting an
4	extension of time until July 9, 2015, within which to file the fast track reply.
5	6. I would submit that, pursuant to NRAP 3C(h), the factors
6	outlined above constitute both need and merit for granting an extension of time
7	within which to file the fast track reply.
8	7. This request by the Nevada State Public Defender for an
9	extension of time for the filing of the fast track statement is made for good cause
10	and not for the purpose of unnecessary delay.
11	DATED this 29th day of,
12	2015.
13	
14	SALLY DESOTO
15	SUBSCRIBED AND SWORN (or affirmed) to
16	by SALLY DESOTO before me this day of, 2015.
17	Joseph M. Regan
18	Notary Public
19	TOSCA M. RENNER NOTARY PUBLIC STATE OF NEVADA NO. 91-0703-12 My Appl Exp. Mar. 8, 2016
20	W. I.

<u>CERTIFICATE OF SERVICE</u>
I hereby certify that this document was filed electronically with the
Nevada Supreme Court on the 29th day of June, 2015. Electronic Service of the
foregoing document shall be made in accordance with the Master Service List as
follows:
CATHERINE CORTEZ MASTO NEVADA ATTORNEY GENERAL
SALLY DESOTO
CHIEF APPELLATE DEPUTY PUBLIC DEFENDER
JASON WOODBURY CARSON CITY DISTRICT ATTORNEY
I further certify that I served a copy of this document by mailing a true
and correct copy thereof, postage pre-paid, addressed to:
Ms. LINDSIE NEWMAN
#1136265 - FMWCC 4370 SMILEY ROAD
LAS VEGAS NV 89115
DATED this 29th day of June, 2015.
SIGNED: /s/ Tosca M. Renner
Employee of Nevada State Public Defender