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

9 No. 68011

Electronically Filed
Jul 06 2015 03:40 p.m.
Tracie K. Lindeman
Clerk of Supreme Court


10 CHRISTOPHER LEROY ROACH,)
11)
12 Appellant,)
13 v.)
14 STATE OF NEVADA,)
15 Respondent.)

16 **MOTION FOR EXTENSION OF TIME TO FILE FAST TRACK STATEMENT**

17 COMES NOW, Appellant CHRISTOPHER LEROY ROACH, by and through his
18 counsel, CAESAR ALMASE, and moves this Honorable Court to grant an extension of time
19 to file Appellant's Fast Track Statement forty-five (45) days after the current deadline of
20 July 7, 2015. This Motion is made pursuant to Nevada Rule of Appellate Procedure
21 3C(i)(2), the attached Memorandum, and Affidavit of the undersigned counsel.

22 DATED this 6 of July 2015.

23 By:

24 
25 Caesar Almase
26 Nevada Bar No. 7974
27 Almase Law
28 530 S. 7th Street
Las Vegas, NV 89101
(702) 463-5590
Attorney For Appellant

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MEMORANDUM

NRAP 3C(i)(2) provides:

Additional Extensions by Motion. Subsequent extensions of time for filing fast track statements and responses, and supplemental fast track statements and responses shall be granted only upon motion to the Supreme Court. The motion shall justify the requested extension in light of the time limits provided in this Rule, and shall specify the exact length of the extension requested. Extensions of time for the filing of fast track statements and responses, and supplemental fast track statements and responses shall be granted only upon demonstration of extreme need or merit. Sanctions may be imposed if a motion is brought without reasonable grounds.

On May 29, 2015, counsel for the Appellant, Christopher Roach, sent correspondence to him while incarcerated at Clark County Detention Center, and on June 19, 2015, a second letter was mailed to Mr. Roach at High Desert State Prison. Counsel directed Mr. Roach to send a reply detailing the grounds for the instant appeal. As of the writing of the instant motion, Mr. Roach has not sent correspondence, nor is counsel aware of any attempt at communication by Mr. Roach. Counsel is unaware of any appealable issues, and without communication from Mr. Roach, a Fast Track Statement cannot be properly filed.

The current deadline of July 7, 2015, does not afford counsel enough time to send further correspondence and for Mr. Roach to send return correspondence, in order to properly and effectively prepare the Fast Track Statement and Appendix. If this extension of time is granted, counsel does not anticipate requiring any further extensions of time. This request for an extension of time is meritorious, otherwise, defense counsel would be unable to render effective assistance with regard to the briefing of appellate issues.

AFFIDAVIT OF COUNSEL

STATE OF NEVADA }
COUNTY OF CLARK } SS:

I, CAESAR ALMASE, having been duly sworn, hereby depose and state the following, under penalty of perjury:

1. I am an attorney duly licensed to practice law in all courts in the state of Nevada.

2. I am the attorney of record for Appellant Christopher Leroy Roach in the above-entitled case, and as such, I have personal knowledge of the matters contained herein.

3. The Fast Track Statement and Appendix are due by July 7, 2015.

5. The time remaining to prepare the Fast Track Statement and Appendix in this matter is insufficient.

6. Forty-five days is a suitable amount of time to prepare the Fast Track Statement and Appendix.

7. If a forty-five day extension is granted, counsel does not anticipate requiring any further extensions of time.

8. This request for an extension of time is meritorious, otherwise, defense counsel would be unable to render effective assistance with regard to the briefing of all appellate issues.

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9. This motion is being made in good faith to provide Mr. Roach with effective assistance of counsel in his appeal, and not for the purposes of delay.


FURTHER YOUR AFFIANT SAYETH NAUGHT.

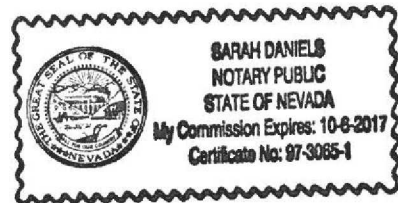
DATED this 6 day of July 2015.


CAESAR ALMASE, ESQ.

SUBSCRIBED AND SWORN TO

BEFORE ME this 6th day of July 2015.


Notary Public in and for Said County and State



CERTIFICATE OF SERVICE

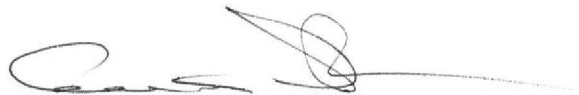
I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on the 6 day of July 2015. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Steven S. Owens
Chief Deputy District Attorney

Adam Paul Laxalt
Attorney General

Service of the foregoing document shall also be made via US regular mail to the following:

Christopher Leroy Roach, Inmate ID #1076731
Indian Springs, Nevada State Prison
PO Box 650
Indian Springs, NV 89070
LEGAL MAIL



Caesar Almase