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

3 WILLIE MASON,

4 Appellant,

5 vs.

6 THE STATE OF NEVADA,

7 Respondent.
8
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No.: 68497

DC No.: C267882

Electronically Filed
Nov 13 2015 02:32 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

10 **MOTION FOR EXTENSION OF TIME**

11 COMES NOW Appellant WILLIE MASON, by and through his attorneys
12 Robert L. Langford, Esq., and Matthew J. Rashbrook, and, pursuant to Nev. R.
13 App. P. 31(b)(3), hereby moves this honorable Court for an extension of time
14 within which to file the Opening Brief and Appendix. This motion is based on
15 the following memorandum and all papers and pleadings on file herein.
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18 DATED this 13th day of November, 2015.

19 Respectfully submitted by:

20
21 /s/ Matthew J. Rashbrook

22 ROBERT L. LANGFORD, Esq.

23 Nevada Bar No. 3988

24 MATTHEW J. RASHBROOK

25 Nevada Bar No. 12477

26 ROBERT L. LANGFORD & ASSOCIATES

27 616 S. 8th Street

28 Las Vegas, NV 89101

ATTORNEYS FOR APPELLANT MASON

1 MEMORANDUM

2 Appellant's Opening Brief and Appendix are presently due November 25,
3 2015. Appellant has not previously requested any extensions of time.
4

5 Appellant has recently been moved to Ely State Prison. Additionally,
6 counsel have recently participated in two trials, *State v. Tiaffay*, District Court
7 Case No. C-12-286317-1, and *State v. Harris*, District Court Case No. C-13-
8 289274-1, a capital murder trial. As a result of these factors, counsel have been
9 unable to meet with Mr. Mason to prepare the Opening Brief. Therefore,
10 Appellant hereby requests an extension of the present deadline within which to
11 file the Opening Brief and Appendix, so that counsel may comply with the
12 standards outlined in ADKT 411.
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14

15 Additionally, counsel are presently preparing for the trial of *State v.*
16 *Holland*, District Court Case No. C-13-290530-1, in which counsel have been
17 assigned as special prosecutors. That trial is firm set to begin November 30,
18 2015. The trial of *State v. Holland* is anticipated to last approximately eight
19 days.
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1 For all the foregoing reasons, Appellant respectfully requests an extension
2 of 60-days, extending the present deadline of November 25, 2015, to January
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4 25, 2016. Although extensions longer than 30 days are typically disfavored,
5 Appellant seeks a longer extension so that counsel may effectively pursue all
6
7 legitimate avenues of appeal and may do so in consultation with Appellant.

8 DATED this 13th day of November, 2015.

9 Respectfully submitted by:

10
11 /s/ Matthew J. Rashbrook
12 ROBERT L. LANGFORD, Esq.
13 Nevada Bar No. 3988
14 MATTHEW J. RASHBROOK
15 Nevada Bar No. 12477
16 ROBERT L. LANGFORD & ASSOCIATES
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18 Las Vegas, NV 89101
19 ATTORNEYS FOR APPELLANT MASON
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