1	IN THE SUPREME COURT OF THE STATE OF NEVADA
2	
	IN THE MATTER OF THE) Case No. 69047 PARENTAL RIGHTS AS TO: (Dist. Ct. Plectrostic State of Control of Contro
4 5	AAMIYAH DE'NASIA LAMB AND CHRISTOPHER LAMONT BYNUM, JR., Clerk of Supreme Court
6	}
7 8	KEAUNDRA DEBERRY, AAMIYAH DE'NASIA LAMB AND CHRISTOPHER LAMONT BYNUM, JR.,
9	MINORS. Co-Appellants,
10	vs.
	CLARK COUNTY DEPARTMENT OF SERVICES,
12	Respondents,
14	MOTION FOR EXTENSION OF TIME TO FILE CO-APPELLANTS' REPLY BRIEF
15	COMES NOW, Co-Appellant, KEAUNDRA DEBERRY, by and through her attorneys,
16	DAVID M. SCHIECK, Special Public Defender and DEANNA M. MOLINAR, Deputy
17	Special Public Defender, and moves this Court for an Order granting an extension of time to
18	file Co-Appellant's Reply Brief. Counsel is requesting 20 days, up to and including May 25,
19	2016.
20	This Motion is made and based upon NRAP 31, and the Declaration attached hereto.
21 22	DATED this 25th day of May, 2016.
23	SUBMITTED BY: DAVID M. SCHIECK SPECIAL PUBLIC DEFENDER
24	/s/Deanna M. Molinar
25	7 07 2000000000000000000000000000000000
26	Deanna M. Molinar, Esq. Deputy Special Public Defender
27	330 S. Third St., Ste. 800 Las Vegas, Nevada 89155
28	702-455-6266 Attorney for Co-Appellant

1	STATEMENT OF FACTS
2	On April 22, 2016, the undersigned telephonically requested an Extension of Time as
3	to Appellant's Reply Brief. The extension was granted and the Reply Brief was then schedule
4	to be due on May 10, 2016. On May 10, 2016, the undersigned attempted to file both the
5	Appendix and Reply Brief. Due to an oversight, the undersigned was not aware that
6	Appellant's Reply Brief was rejected.
7	
8	POINTS AND AUTHORITIES
9	NRAP 31 states in pertinent part as follows: "Applications for extensions of time
10	beyond that to which the parties are permitted to stipulate are not favored, and will be
11	considered only on motion for good cause clearly shown"
12	Co-Appellant is requesting an extension of 20 days to file the Reply Brief based on the
13	Declaration of Counsel attached hereto. The State would not be prejudiced by the granting of
14	this Motion.
15	CONCLUSION
16	An extension of time of 20 days, up to and including May 25, 2016, is requested to file
17	the Reply Brief.
18	DATED this 25th day of May, 2016.
19 20	SUBMITTED BY: DAVID M. SCHIECK SPECIAL PUBLIC DEFENDER
21	/s/ DEANNA M. MOLINAR
22	
23	Deanna M. Molinar Deputy Special Public Defender
24	Nevada Bar No. 4771 330 S. Third St., Ste. 800
25	Las Vegas, Nevada 89155
26	
27	
28	

1	DECLARATION OF DEANNA M. MOLINAR
2	DEANNA M. MOLINAR makes the following declaration:
3	I am the Deputy Special Public Defender representing Keaundra Deberry on her
4	Appeal. I am requesting 20 days to file the Reply Brief.
5	I declare under penalty of perjury that the foregoing is true and correct. (NRS 53.045).
6	EXECUTED this 25th day of May, 2016
7	
8	/s/ DEANNA M. MOLINAR
9	
10	DEANNA M. MOLINAR
11	CERTIFICATE OF SERVICE
12	The undersigned does hereby certify that on the 25th day of May, 2016 a copy of the
13	foregoing document was served BY ELECTRONIC FILING TO
14	Ronald Cordes, Esq. District Attorney's Office 200 Lewis Ave., 3 rd Floor
15	200 Lewis Ave., 3 rd Floor Las Vegas, NV 89155
16	Christal Dixon, Esq
17	Legal Aid Center of Southern Nevada 725 E. Charleston Blvd.
	Las Vegas, NV 89104
19	/s/ DEANNA M. MOLINAR DEANNA M. MOLINAR
20	DEANNA W. MOLINAK
21 22	
23	
24	
25	
26	
27	
28	
-~	' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' '