

1 Thomas A. Ericsson, Esq.  
Nevada Bar No. 4982  
2 ORONOZ, ERICSSON & GAFFNEY, LLC  
1050 Indigo Drive, Suite 120  
3 Las Vegas, Nevada 89145  
Telephone: (702) 878-2889  
4 Facsimile: (702) 522-1542  
tom@oronozlawyers.com

Electronically Filed  
Nov 01 2016 04:17 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

5 Robert L. Langford, Esq.  
6 Nevada Bar No. 3988  
ROBERT L. LANGFORD & ASSOCIATES  
7 616 S. 8<sup>th</sup> Street  
Las Vegas, Nevada 89101  
8 Telephone: (702) 960-0686  
*Attorneys for Appellant*

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

10 )  
11 AMMAR HARRIS aka AMMAR ASIM )  
12 FARUQ HARRIS, )  
Appellant, )  
13 vs. )  
14 THE STATE OF NEVADA, )  
15 Respondent. )

CASE NO.: 69509

**APPELLANT'S MOTION TO  
EXTEND TIME TO FILE  
OPENING BRIEF**  
(Fourth Request)

**Death Penalty**

16 )  
17 Appellant AMMAR HARRIS, by and through his counsel of record, Thomas A.  
18 Ericsson, Esq. and Robert L. Langford, Esq., hereby submits this Motion to Extend Time to File  
19 Opening Brief.

20 Mr. Harris' Opening Brief is currently due November 1, 2016. This is the fourth request  
21 for an extension of time to file the Opening Brief. Counsel for Mr. Harris request an extension of  
22 time within in which to file the Opening Brief because a medical emergency requiring surgery  
23 within the immediate family of Mr. Harris' counsel has prevented the timely completion of the  
24

1 Brief. Counsel for Mr. Harris request an extension of a further seven days, to allow counsel to  
2 complete the brief in light of this family emergency.

3 **FACTUAL AND PROCEDURAL BACKGROUND**

4 On February 20, 2013, a verbal exchange took place between occupants of a Range  
5 Rover and a Maserati on Las Vegas Boulevard, Las Vegas, Nevada. Shots were fired. One  
6 passenger in the Maserati was killed, the other injured. The Maserati entered the Flamingo and  
7 Las Vegas Boulevard intersection and struck a taxicab. The taxicab exploded, and the two  
8 occupants of the taxicab were killed.

9 This matter proceeded to a jury trial in October and November, 2015, and Ammar Harris  
10 was convicted of all charges and sentenced to three death sentences on the three murder  
11 convictions.

12 The Clerk of the Court of the Eighth Judicial District, Clark County, Nevada, filed a  
13 Notice of Appeal in this matter on January 5, 2016. The Record on Appeal was filed by the court  
14 clerk on February 4, 2016. The Record on Appeal consists of 26 volumes and 5,797 pages.

15 **ARGUMENT**

16 Nevada Rule of Appellate Procedure 31(b)(3) provides in relevant part:

17 **Motions for Extensions of Time.** A motion for  
18 extension of time for filing a brief may be made no later than  
19 the due date for the brief and must comply with the provisions  
20 of this Rule and Rule 27.

21 **(A) Contents of Motion.** A motion for extension  
22 of time for filing a brief shall include the following:  
23

24 (i) The date when the brief is due;

1 (ii) The number of extensions of time previously  
2 granted (including a 5-day telephonic extension), and if  
3 extensions were granted, the original date when the brief was  
4 due;

5 (iii) Whether any previous requests for extensions of  
6 time have been denied or denied in part;

7 (iv) The reasons or grounds why an extension is  
8 necessary; and

9 (v) The length of the extension requested and the  
10 date on which the brief would become due.

11 . . .

12 **(D) Motions in Capital Cases.** The Supreme  
13 Court may grant an initial motion for an extension of time of  
14 up to 60 days for filing a brief in a capital case upon a  
15 showing of good cause. The court shall not grant additional  
16 extensions of time except upon a showing of extraordinary  
17 circumstances and extreme need.

18 Mr. Harris' Opening Brief and Appendix are currently due on November 1, 2016. This is  
19 the fourth request for an extension. Mr. Harris requests a seven-day extension.

20 During the last several weeks, counsel for Mr. Harris has experienced a dire illness of an  
21 immediate family member, which has required surgical intervention and an intensive recovery  
22 period. Due to that illness, counsel request a brief extension of seven days.

23 Mr. Harris therefore respectfully moves for an enlargement of time of seven days,  
24 rendering the Opening Brief and Appendix due on November 10, 2016.

This motion is made in good faith and not for the purpose of undue delay.

///

///

///

///

///

///

1 **CONCLUSION**

2 Based on the foregoing, Mr. Harris respectfully requests an enlargement of time of seven  
3 days, allowing until November 10, 2016 to file his Opening Brief.

4 DATED this 1st day of November, 2016.

5 Respectfully submitted,

6 By: /s/ Robert L. Langford  
7 THOMAS A. ERICSSON, ESQ.  
8 Nevada Bar No. 4982  
9 ROBERT L. LANGFORD, ESQ.  
10 Nevada Bar No. 3988  
11 *Attorneys for Appellant*  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

1 **CERTIFICATE OF SERVICE**

2 I hereby certify and affirm that this document was filed electronically with the Nevada  
3 Supreme Court on November 1st, 2016. Electronic service of the foregoing document shall be  
4 made in accordance with the Master Service List as follows:

5 ADAM PAUL LAXALT  
6 Nevada Attorney General

7 STEVEN S. OWENS  
8 Chief Deputy District Attorney

9 THOMAS A. ERICSSON  
10 ROBERT L. LANGFORD  
11 Counsel for Appellant

12 By: /s/ Matthew J. Rashbrook  
13 An employee of ROBERT L. LANGFORD & ASSOCIATES  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24