

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 2017 11:29 a.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. 8th 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,)
Respondent.)
15)
16)

CASE NO.: 69509

**APPELLANT'S MOTION TO
EXTEND TIME TO FILE REPLY
BRIEF**
(Second Request)

Death Penalty

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

19 Mr. Harris' Reply Brief is due November 1, 2017. This is the second request for an
20 extension of time to file the Reply Brief. Counsel for Mr. Harris request a further extension of
21 time within in which to file the Reply Brief because of the complexity and volume of the record
22 in this matter, and the novel arguments raised by the State in the Answering Brief.

23 ///
24

1 **FACTUAL AND PROCEDURAL BACKGROUND**

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

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

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

13 **ARGUMENT**

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

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

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

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

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

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

1 (iv) The reasons or grounds why an extension is
2 necessary; and

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

5 . . .

6 **(D) Motions in Capital Cases.** The Supreme
7 Court may grant an initial motion for an extension of time of
8 up to 60 days for filing a brief in a capital case upon a
9 showing of good cause. The court shall not grant additional
10 extensions of time except upon a showing of extraordinary
11 circumstances and extreme need.

12 Mr. Harris' Reply Brief is currently due November 1, 2017. This is the second request for
13 an extension on this brief. Mr. Harris requests a 30-day extension.

14 Due to the lengthy record in this matter, the novel arguments raised by the State in the
15 Answering Brief, and counsel's mindfulness of the standards under ADKT 411, an extension of
16 time is required within which to file Appellant's Reply Brief.

17 Mr. Harris therefore respectfully moves for an extension of 30 days, rendering the Reply
18 Brief due on December 1, 2017.

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

20 ///

21 ///

22 ///

23 ///

24 ///

///

///

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24

DATED this 1st day of November, 2017.

By: /s/ Robert L. Langford
 THOMAS A. ERICSSON, ESQ.
 Nevada Bar No. 4982
 ROBERT L. LANGFORD, ESQ.
 Nevada Bar No. 3988
Attorneys for Appellant

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24

ADAM PAUL LAXALT
Nevada Attorney General

STEVEN S. OWENS
Chief Deputy District Attorney

THOMAS A. ERICSSON
ROBERT L. LANGFORD
Counsel for Appellant

11
12
13
14
15
16
17
18
19
20
21
22
23
24