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Tracie K. Lindeman
Clerk of Supreme Court

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

8 RALPH ALEXANDER,

9 Appellant,

Docket No.

70139

10 *vs.*

11 THE STATE OF NEVADA,

12 Respondent.

**MOTION FOR EXTENSION OF TIME
TO FILE FAST TRACK STATEMENT
AND APPENDIX**

13
14 Appellant Ralph Alexander, through counsel John Parris, hereby sub-
15 mits this Motion for Extension of Time to File Fast Track Statement and Ap-
16 pendix. This motion is not made for the purposes of unnecessary delay or
17 for any improper purpose.

18
19 DATED this 7 of July, 2016.

20 /s/ John Parris

21 JOHN P. PARRIS, ESQ.
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22 **LAW OFFICES OF JOHN P. PARRIS**
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24 Counsel for Appellant

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 On April 18, 2016, Appellant Ralph Alexander initiated the instant ap-
3 peal from the Judgment of Conviction in Eighth Judicial District Court case
4 number C-15-308719-1. The undersigned counsel filed and served a Rough
5 Draft Transcript Request with the district court on May 3, 2016. The court
6 reporter filed a notice on June 14, 2016, indicating that the transcripts were
7 prepared. The Fast Track Statement and Appendix are due July 11, 2016.

8 The trial in this case commenced on December 1, 2015, and concluded
9 after five days on December 7, 2015. The district court sentenced Mr. Alex-
10 ander to an aggregate sentence of eighteen to forty-five years in the Nevada
11 Department of Corrections. Given the severity of the convictions, the mag-
12 nitude of the sentence, and the fact that counsel has only had three weeks to
13 review lengthy trial transcripts, the undersigned counsel requires more time
14 to review the transcripts before the undersigned counsel can effectively raise
15 a meritorious appellate argument.

16 Because counsel cannot effectively draft the issues to be raised in the
17 fast track statement without extensive review of the transcripts, the under-
18 signed counsel asks this Court to extend the time for filing the Fast Track
19 Statement and Appendix for an additional ninety days to October 10, 2016.
20 This motion is made in good faith and not for the purposes of unnecessary
21 delay or for any improper basis.

22
23 DATED this 7 of July, 2016.

24 /s/ John Parris
25 _____
26 JOHN P. PARRIS, ESQ.
27 Nevada Bar No. 7479
28 **LAW OFFICES OF JOHN P. PARRIS**
 324 South 3rd Street, Suite 200
 Las Vegas, NV 89101
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 Counsel for Appellant

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I am a person competent to serve papers, that I am
3 not a party to the above-entitled action, and that on July 7, 2016, I served the
4 foregoing document via the Nevada Supreme Court's eFlex system on the
5 counsel and/or parties as listed below:
6

7	Name	Address
8	Steven B. Wolfson, Esq.	200 Lewis Ave.
9	Steven S. Owens, Esq.	Las Vegas, NV 89155
10	Clark County District Attorney's Office	
11	Adam Laxalt, Esq.	100 N. Carson St.
12	Nevada Attorney General's Office	Carson City, NV 89701

13
14
15 /s/ John Parris
16 JOHN P. PARRIS, ESQ.
17 Nevada Bar No. 7479
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21 (702) 382-0905
22 Counsel for Appellant
23
24
25
26

27 **AFFIRMATION**

28 Pursuant to NRS 239B.030, this document contains no social security numbers.

/s/ John Parris

John P. Parris, Esq.

07-07-16

Date