

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

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3
4 GREG WILLIAMS,)

5 Appellant,)

6 vs.)

7 THE STATE OF NEVADA,)

8 Respondent.)

Electronically Filed
Dec 21 2016 08:36 a.m.
Elizabeth A. Brown
Clerk of Supreme Court
Case No. 70868

10
11 **APPELLANT'S MOTION FOR EXTENSION OF TIME**

12 Comes Now Appellant GREG WILLIAMS, by and through Deputy Public
13 Defender AUDREY M. CONWAY, and moves for an extension of time of sixty days
14 from Friday, December 23, 2016, through and including Monday, February 20, 2017, to
15 file the Opening Brief in this case. The grounds for this request are described in the
16 attached Declaration.
17

18 DATED this 20th day of December, 2016.

19
20 PHILIP J. KOHN
21 CLARK COUNTY PUBLIC DEFENDER

22
23 By /s/ Audrey M. Conway
24 AUDREY M. CONWAY, #5611
25 Deputy Public Defender
26 309 So. Third Street, Suite #226
27 Las Vegas, Nevada 89155-2610
28 (702) 455-4685

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1 suppress evidence; (5) the trial court's admission of prejudicial and irrelevant evidence;
2 (6) the trial court's denial of defense objections to improper testimony and evidence; (7)
3 the trial court's refusal to properly instruct the jurors on the defense theory of the case;
4 (8) the trial court's provision of jury instructions that undermined the burden of proof and
5 the presumption of innocence; (9) the trial court's denial of the defense motion under
6 *Batson v. Kentucky*; (10) the trial Court's improper rulings during the jury selection
7 process; and (11) whether the State proved these charges beyond a reasonable doubt.
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10 5. In light of the serious nature of the charges, the substantial sentence in this
11 case, and the number of potential appellate issues that require additional research and
12 exploration, I respectfully request additional preparation time to facilitate communication
13 with the client, additional research and briefing, and additional investigation of
14 potentially meritorious claims of error. I request an extension of sixty days within which
15 to file the Opening Brief in light of the delay in receipt of the appendix and the
16 substantive and complex nature of the issues in this case. I request this additional time
17 period to diligently and accurately perfect this appeal and to fully research and identify
18 unpreserved claims of error.
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1 6. This request for extension of time is made in good faith and not for the
2 purposes of delay. It is the best professional judgment of the undersigned that this
3 extension is crucial to the perfection of this appeal and to the provision of effective
4 assistance of counsel to this client.
5

6 I declare under penalty of perjury that the foregoing is true and correct.

7 EXECUTED on the 20th day of December, 2016.
8

9 /s/ Audrey M. Conway
10 AUDREY M. CONWAY
11

12 **CERTIFICATE OF SERVICE**

13 I hereby certify that this document was filed electronically with the Nevada
14 Supreme Court on the 20th day of December, 2016. Electronic Service of the foregoing
15 document shall be made in accordance with the Master Service List as follows:
16

17 ADAM LAXALT
18 STEVEN S. OWENS

 AUDREY M. CONWAY
 HOWARD S. BROOKS

19 I further certify that I served a copy of this document by mailing a true and
20 correct copy thereof, postage pre-paid, addressed to:
21

22 GREG WILLIAMS
23 NDOC No. 1161737
24 c/o Ely State Prison
25 P.O. Box 1989
26 Ely, NV 89301

27 BY /s/ Carrie M. Connolly
28 Employee, Clark County Public
 Defender's Office