	IN THE CURRENCE COURT OF THE OF AFTE OF MEXADA
1 2	IN THE SUPREME COURT OF THE STATE OF NEVADA
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4	GREG WILLIAMS,) Electronically Filed
5	Appellant,) Dec 21 2016 08:36 a.m. Appellant,) Elizabeth A. Brown
6	vs.) Case NOIe7R868 Supreme Court
7)))))))))))))))))))
8 9) Respondent.)
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 15	from Friday, December 23, 2016, through and including Monday, February 20, 2017, to
16	file the Opening Brief in this case. The grounds for this request are described in the
17	attached Declaration.
18 19	DATED this 20 th day of December, 2016.
20	PHILIP J. KOHN
21	CLARK COUNTY PUBLIC DEFENDER
22	
23	By <u>/s/ Audrey M. Conway</u>
24	AUDREY M. CONWAY, #5611 Deputy Public Defender
25	309 So. Third Street, Suite #226
26	Las Vegas, Nevada 89155-2610 (702) 455-4685
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	1 Docket 70868 Document 2016-39599

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DECLARATION OF AUDREY M. CONWAY

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1. I am an attorney licensed to practice law in the State of Nevada; I am a deputy public defender assigned to handle the appeal of this matter; I am familiar with the procedural history of this case.

6 The Notice of Appeal in this case was filed on July 15, 2016. The final 2. 7 transcript was prepared on October 3, 2016, and received by this office the following 8 week. I received an initial version of the appellate appendix on or about the first week in 9 November, 2016; however, I discovered that a hearing transcript had been omitted from 10 11 the appellate appendix. Appellate staff researched the issue and determined that the 12 transcript had been previously prepared prior to the submission of appellant's transcript 13 request. Appellate staff subsequently obtained the transcript and finalized the appellate 14 15 appendix, which I received on or about November 23, 2016. The appendix consists of six 16 volumes and over 1200 pages of transcripts, pleadings, and court documents. In addition, 17 I have received multiple boxes of trial exhibits and documents from the District Court 18 19 file.

3. After a five-day trial, the appellant in this case was conviction of three counts
of Sexual Assault on a Minor under 14 and six counts of Lewdness with a Minor under
14. Mr. Williams is serving an aggregate sentence of 115 years to life in prison.

4. As of this writing, I have identified the following potential issues which may
have merit in this appeal: (1) the trial court's denial of the defense motion regarding the
complaining witnesses' prior sexual knowledge; (2) the trial court's refusal to grant the
defendant's motion for the appointment of alternate counsel; (3) the trial court's denial of
the defense motion to sever counts; (4) the trial Court's denial of the defense motion to

suppress evidence; (5) the trial court's admission of prejudicial and irrelevant evidence; 1 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 6 the presumption of innocence; (9) the trial court's denial of the defense motion under 7 Batson v. Kentucky; (10) the trial Court's improper rulings during the jury selection 8 process; and (11) whether the State proved these charges beyond a reasonable doubt. 9

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 15 potentially meritorious claims of error. I request an extension of sixty days within which 16 to file the Opening Brief in light of the delay in receipt of the appendix and the 17 substantive and complex nature of the issues in this case. I request this additional time 18 19 period to diligently and accurately perfect this appeal and to fully research and identify 20 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
5	assistance of counsel to this client.
6	I declare under penalty of perjury that the foregoing is true and correct.
7	
8	EXECUTED on the 20 th day of December, 2016.
9	/s/ Audrey M. Conway
10	AUDREY M. CONWAY
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12	CERTIFICATE OF SERVICE
13	I hereby certify that this document was filed electronically with the Nevada
14	Supreme Court on the 20 th day of December, 2016. Electronic Service of the foregoing
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16	document shall be made in accordance with the Master Service List as follows:
17	ADAM LAXALT AUDREY M. CONWAY
18	STEVEN S. OWENS 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 NDOC No. 1161737
23	c/o Ely State Prison
24	P.O. Box 1989 Ely, NV 89301
25	
26	BY <u>/s/ Carrie M. Connolly</u> Employee, Clark County Public
27	Defender's Office
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