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

ROLAND BRADLEY YOUNG

Appellant,

vs.

THE STATE OF NEVADA,

Respondent.

S.Ct. No. 71073

D.C. No. C-12-280339-2

Electronically Filed  
Jun 15 2017 10:15 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**MOTION FOR ENLARGEMENT OF TIME**  
**(First Request)**

COMES NOW Appellant, ROLAND BRADLEY YOUNG, by and through his counsel in this matter, JEAN J. SCHWARTZER, ESQ., and moves this Court for the first time for an enlargement of time of forty-five (45) days from April 9, 2017 to file Appellant's Reply Brief, making said Brief due May 24, 2017. This motion is based upon the following memorandum and all papers and pleadings on file herein.

Dated this 11<sup>th</sup> day of April, 2017.

Respectfully submitted,

/s/ Jean J. Schwartzer

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Counsel for Appellant

**MEMORANDUM**

I, JEAN J. SCHWARTZER, ESQ., am the attorney in the above-captioned case. Pursuant to NRAP 31(b)(3), this Court may grant a first or initial motion for extension of time for filing a brief upon a clear showing of good cause. This is Appellant's first request for an extension of time to file his Reply Brief.

With respect to good cause, when counsel for Appellant's filed his Opening Brief, she was unable to send a copy of it to Appellant due to the fact that he had been paroled counsel was unaware of his whereabouts. Counsel was recently able to make contact with Appellant through the Nevada Department of Parole and Probation and has send Appellant his Opening Brief as well as the State's Responding Brief. Appellant needs an additional forty-five (45) days to complete the Reply Brief in the instant case. This will allow Appellant to review the Opening Brief and State's Responding Brief; have a discussion with counsel regarding his Reply Brief; and counsel will have time to draft and file the Reply Brief. (Additionally, during one week of this forty-five (45) day time period, counsel's two small children will be on Spring Break and counsel will not be able to work during that time.)

Therefore, appellant moves for an enlargement of time of forty-five (45) days within which to file Appellant's Reply Brief up to and including May 24, 2017.<sup>1</sup>

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<sup>1</sup> This Motion was initially timely filed on April 10, 2017. However, it was rejected due to a filing process error.

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This Motion is made in good faith and not for the purposes of undue delay.

I declare under penalty of perjury the factual representations set forth in the foregoing memorandum are true and correct.

Dated this 11<sup>th</sup> day of April, 2017.

Respectfully submitted,

/s/ Jean J. Schwartz  
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ADAM LAXALT, ESQ.  
Nevada Attorney General  
STEVEN S. OWENS  
Chief Deputy District Attorney

/s/ Jean J. Schwartz  
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