

IN THE SUPREME COURT OF THE STATE OF NEVADA

BRANDON STARR,

#1165964

Appellant,

vs.

STATE OF NEVADA,

Respondent.

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Electronically Filed
Feb 08 2017 02:44 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Supreme Court No. 2017-0011
District Court Case: C-14-303022-2

E-FILE

MOTION FOR ENLARGEMENT OF TIME TO FILE OPENING BRIEF

COMES NOW the Appellant, BRANDON STARR, by and through his Counsel, TERRENCE M. JACKSON, ESQ., and moves this Court for an enlargement of time of ninety (90) days within which to file Appellant's Opening Brief, which is currently due March 13, 2017. This motion is based on the following memorandum, the Exhibit 'A' and all papers and pleadings on file herein.

...

DATED this 7th day of February, 2017.

Respectfully submitted,

/s/ Terrence M. Jackson

TERRENCE M. JACKSON, ESQ.

Nevada Bar #00854

Law Office of Terrence M. Jackson

624 South Ninth Street

Las Vegas, Nevada 89101

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Counsel for Brandon Starr

MEMORANDUM

I, TERRENCE M. JACKSON, am a duly licensed attorney in the State of Nevada and am a sole practitioner in the Law Office of Terrence M. Jackson. The Appellant's Opening Brief is currently due on March 13, 2017. I am requesting a ninety-day (90) extension of time in which to file the Opening Brief under NRAP 31(b)(3).

As grounds for this Motion, counsel for Defendant received the necessary records on appeal on January 3, 2017, which had been timely ordered. Counsel has been involved continuously in preparing for a federal court trial which started

February 6, 2017; *United States v. Bundy, et al.*, case number: 2:16-cr-046-GMN-PAL, representing co-defendant Gregory P. Burleson. This trial has been deemed complex with numerous witnesses and counsel. I have attached a letter from Chief Judge Navarro asking that all attorneys be excused from other courts so there are no delays in the *Bundy* trial for at least nine weeks or possibly more. See Exhibit 'A.'

The estimated total appellate record will be approximately 2,000 pages for trial proceedings lasting over two weeks. Because of the length of the trial and the complexity of the legal issues involved, counsel anticipates he will need at least one hundred (100) hours to review the entire record and prepare the Opening Brief of the Appeal.

Due to the above-described circumstances, Appellant respectfully requests the Court's permission for an extension of time of ninety days to file the Opening Brief, making the Appellant's brief due to be filed on or before Monday, June 12, 2017. This Motion is not made for purposes of delay but made in good faith and this is the first request for an enlargement of time to file the Opening Brief.

DATED this 7th day of February, 2017.

Respectfully submitted,

/s/ Terrence M. Jackson

TERRENCE M. JACKSON, ESQ.

Nevada Bar #00854

T: 702.386.0001 / F: 702.386.0085

Terry.jackson.esq@gmail.com

Counsel for Defendant Brandon Starr

CERTIFICATE OF SERVICE and ELECTRONIC FILING

I hereby certify and affirm I am an assistant in the office of Terrence M. Jackson, Esquire, a person of such age and discretion as to be competent to serve papers and that on the 7th day of February, 2017, I served this Document, MOTION FOR ENLARGEMENT OF TIME TO FILE OPENING BRIEF, filed electronically with the Nevada Supreme Court Clerk by Electronic Service (*eFlex*) as follows:

STEVEN B. WOLFSON

Clark County District Attorney

steven.wolfson@clarkcountynvda.com

STEVEN S. OWENS

Chief Deputy D.A.-Criminal

steven.owens@clarkcountynvda.com

ADAM LAXALT

Nevada Attorney General

100 North Carson Street

Carson City, NV 89701

And by U.S. Postal Service, First class postage affixed to:

Brandon Starr, ID#1165964

High Desert State Prison

Post Office Box 650

Indian Springs, Nevada 89070-0650

By: /s/ Ila C. Wills

Assistant to Terrence M. Jackson, Esquire

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

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4 **Supreme Court No.: 71401**

5 District Court Case: C-14-303022-2
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12 **EXHIBIT 'A'**
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CHAMBERS OF
GLORIA M. NAVARRO
U.S. DISTRICT JUDGE

LLOYD D. GEORGE U.S. COURTHOUSE
333 LAS VEGAS BOULEVARD SOUTH, SUITE 7005
LAS VEGAS, NEVADA 89101
TELEPHONE: (702) 464-5490
FACSIMILE: (702) 464-5491

December 23, 2016

In re: **United States of America v. Cliven Bundy, et al. 2:16-cr-46-GMN-PAL**

To whom it may concern,


Please excuse the below-listed attorneys from all court appearances during the trial period in the above-referenced case, which is scheduled to begin on February 6, 2017:

Jess R. Marchese
Todd Leventhal
Shawn Perez
Richard Tanasi
Terrance Jackson
John George

This is a complex case which is expected to last approximately seven to nine weeks with numerous witnesses and counsel. Accordingly, it is very important to keep the matter moving efficiently in order to keep the desired schedule. We will only be in trial from Monday to Thursday during the hours of 9:00 a.m. to 5:00 p.m. We will not have trial on Fridays. We will also be dark the week of March 27-31, 2017.

Should you have any questions, please feel free to contact my Courtroom Administrator, Aaron Blazeovich at aaron_blazeovich@nvd.uscourts.gov.

Sincerely,



GLORIA M. NAVARRO, Chief Judge
United States District Court
(702) 464-5421