## 1 IN THE SUPREME COURT OF THE STATE OF NEVADA 2 3 THE STATE OF NEVADA. NO. 71621 Electronically Filed 4 Mar 01 2017 01:02 p.m. Petitioner, Elizabeth A. Brown 5 Clerk of Supreme Court 6 VS. 7 THE EIGHTH JUDICIAL DISTRICT 8 COURT OF THE STATE OF NEVADA. IN AND FOR THE COUNTY OF CLARK, AND THE HONORABLE JENNIFER 10 TOGLIATTI, DISTRICT JUDGE, 11 Respondents. 12 and JEFFREY LYNN BAKER, 13 Real Party in Interest. 14 15 REAL PARTY IN INTEREST ON BEHALF OF RESPONDENT'S 16 MOTION FOR EXTENSION OF TIME TO FILE ANSWER TO PETITION FOR WRIT OF MANDAMUS 17 (SECOND REQUEST) 18 Comes Now JEFFREY LYNN BAKER by and through Deputy Public Defender 19 MIKE FELICIANO, and moves for an extension of time of thirty-five (35) days from 20 21 Wednesday, March 1, 2017 through and including Wednesday, April 5, 2017 to file the Answer 22 to the Petition for Writ of Mandamus in this case. The grounds for this request are described in 23 the attached Declaration. 24 25

DATED this 1st day of March, 2017.

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PHILIP J. KOHN CLARK COUNTY PUBLIC DEFENDER

By /s/Mike Feliciano MIKE FELICIANO, #9312 Deputy Public Defender

## **DECLARATION OF MIKE FELICIANO**

- 1. I am an attorney licensed to practice law in the State of Nevada; I am a deputy public defender assigned to handle this matter; I am familiar with the procedural history of this case.
- 2. On December 16, 2016, this Honorable Court entered an Order Directing Supplement to the Appendix and Directing Answer. The Petitioner filed its supplemental appendix on January 10, 2017, making Real Party In Interest's answer due Monday, January 30, 2017.
- 3. Declarant filed a Motion for Extension on January 27, 2017 and this Honorable Court granted said motion making the Answer due today, March 1, 2017.
- 4. Declarant has been working on the Answer during the month of February. Unfortunately, during the month of February, declarant's minor child had to be involuntarily committed to a mental health facility. While dealing with declarant's minor child, declarant's wife had to be hospitalized suffering from seizures.
- 5. Declarant had every intention of finalizing the answer, however, due to family emergencies, was unable to finalize said Answer.
- 6. Accordingly, declarant is requesting an additional thirty-five (35) days to finalize and file said answer in this matter.
  - 7. This motion is made in good faith, and not for the purpose of delay.

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

    EXECUTED on the 1<sup>st</sup> day of March, 2017.

/s/ Mike Feliciano MIKE FELICIANO

## 1 **CERTIFICATE OF SERVICE** 2 I hereby certify that this document was filed electronically with the Nevada 3. Supreme Court on the 1st day of March, 2017. Electronic Service of the foregoing document 4: shall be made in accordance with the Master Service List as follows: 5. ADAM LAXALT MIKE FELICIANO 6 STEVEN S. OWENS HOWARD S. BROOKS 7 I further certify that I served a copy of this document by mailing a true and 8 correct copy thereof, postage pre-paid, addressed to: 10 JEFFREY LYNN BAKER c/o Clark County Detention Center 11. 330 South Casino Center Blvd. Las Vegas, NV 89101 12 13. BY /s/ Carrie M. Connolly Employee, Clark County Public 14 Defender's Office 15 16 17 18 19 20. 21 22 23 24 25 26 27 28