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Electronically Filed  
Jun 19 2017 09:25 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

8 **SUPREME COURT OF THE STATE OF NEVADA**

9  
10 JOSEPH LAGUNA,

11 Appellant,

12 v.

13 STATE OF NEVADA,

14 Respondent.

DISTRICT COURT NO.: - C-303991-5

SUPREME COURT NO.: - 71939

**LAGUNA 1ST MOTION FOR  
ENLARGEMENT OF TIME TO FILE  
OPENING BRIEF**

15  
16 JOSEPH LAGUNA hereby moves for an enlargement of time to file his opening brief – to  
17 **July 31, 2017.**

18 **A. PROCEDURAL BACKGROUND**

19 The Opening Brief is currently due on July 3, 2017.

20 **B. JUSTIFICATION FOR MOTION**

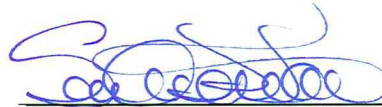
21 The Appendix in this case is over 5,000 pages in length following a three week trial in  
22 which LAGUNA was convicted of murder. Counsel finished reading the appendix before leaving  
23 on a planned one-week vacation beginning on June 2, 2017. Counsel had hoped to have enough  
24 time between that vacation (returned on June 11, 2017) and her next planned vacation beginning  
25 on June 29, 2017, to analyze, research and write the Opening Brief. However, a key issue in this  
26 case revolves around cell phone records about which there are hundreds of pages of very  
27 technical testimony involving azimuths, longitude, and latitude. Exhibits referenced during that  
28

1 testimony are so small that counsel must literally use a magnifying glass in order to review them.  
2 Needless to say, the few weeks between her two vacations is simply not sufficient time to  
3 analyze, research, and write the Opening Brief. Accordingly, counsel requests a short four-week  
4 enlargement of time for filing the Opening Brief.

5 **C. CONCLUSION**

6 Counsel contends that this short enlargement of time is justified, especially given the  
7 length of the record, the very complicated cell phone records which must be analyzed, and the  
8 life sentence which was imposed.

9 Dated this 17<sup>th</sup> day of June, 2017.

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11 SANDRA L. STEWART  
12 Attorney for JOSEPH LAGUNA  
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on June 17, 2017, I served a copy of the:


3 **LAGUNA 1ST MOTION FOR ENLARGEMENT OF TIME**  
4 **TO FILE OPENING BRIEF**

5 by mailing a copy via first class or priority mail, postage thereon fully prepaid, to the following:

6 **JOSEPH LAGUNA**  
7 **INMATE NO. 60578**  
8 **HIGH DESERT STATE PRISON**  
9 **POST OFFICE BOX 650**  
10 **INDIAN SPRINGS, NV 89070**

11 and by e-filing the document with the Nevada Supreme Court, thereby providing access to a copy  
12 to all other interested parties, including but not limited to, the following:

13 **STEVEN B. WOLFSON, ESQ.**  
14 **CLARK COUNTY DISTRICT ATTORNEY**  
15 **200 LEWIS AVENUE**  
16 **LAS VEGAS, NV 89155-2212**

17   
18 **SANDRA L. STEWART**