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Elizabeth A. Brown
Clerk of Supreme Court

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

11 JORGE MENDOZA,

12 Appellant,

13 vs.

14 THE STATE OF NEVADA,

15 Respondent.

Case No. 72056

**APPELLANT'S MOTION TO
ENLARGE TIME TO FILE
REPLY BRIEF**

(1st request)

16 Appellant JORGE MENDOZA, by and through his counsel, respectfully
17 requests additional time in which to file the Reply Brief in this matter.

18 **FACTUAL AND PROCEDURAL BACKGROUND**

19 This appeal arises from a jury trial conviction in the Eighth Judicial District
20 Court, Department 5.

21 On **December 22, 2016**, undersigned counsel filed a Notice of Appeal in this
22 matter. Counsel filed a Request for Rough Draft Transcripts on the same day. Trial
23 in this matter lasted 19 days. Additionally, the undersigned was not trial counsel in
24 this matter. The trial transcripts are the undersigned's first review of this trial. The
25 co-defendants' attorneys in this case handled the trial as well, but the undersigned
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1 has been spending significant time and resources becoming very acquainted with
2 this case.

3 Counsel has several complex issues that need additional research before being
4 able to complete the Reply brief in this matter. As such, Appellant needs a short
5 continuance for additional research required to file the Reply brief.
6

7 Appellant is currently serving a life sentence. Accordingly, counsel requests
8 an additional thirty (30) days to file the Reply Brief, which is currently due February
9 15, 2018.
10

11 **GOOD CAUSE EXISTS TO ENLARGE THE TIME TO FILE**
12 **APPELLANT'S REPLY BRIEF**
13

14 Nevada Rule of Appellate Procedure 26(b)(1)(A) provides in relevant part:

15 For good cause, the court may extend the time prescribed by these Rules
16 or by its order to perform any act, or may permit an act to be done after
17 that time expires.

18 The Appellant's Reply Brief is currently due on February 15, 2018. The
19 Appellant is requesting a thirty (30) day extension of time to file the Reply Brief.
20 Counsel requests this extension of time because this case involves several complex
21 issues to address in the Reply Brief. As such, Appellant needs a short continuance
22 for the additional research required to file the Reply Brief. Appellant is currently
23 serving a life sentence, which makes it very vital to examine all issues appropriately.
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25

26 Mr. Mendoza was sentenced to sentence of life with parole eligibility after 23
27 years in the Nevada Department of Corrections. As such, it is imperative that
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1 Appellant and his counsel have sufficient time to properly address the issues in this
2 case and to prepare the Reply Brief. Therefore, good cause exists for this Court to
3 enlarge the time to file the Reply Brief. Accordingly, Mr. Mendoza respectfully
4 requests an additional 30 days in which to file his Reply Brief.
5

6 Dated this 15th day of February, 2018.

7 GREGORY & WALDO, LLC

8
9 */s/ Amanda Gregory*

10 _____
11 AMANDA S. GREGORY, ESQ.

12 Nevada Bar No.: 11107

13 *Attorneys for Appellant*
14

15 **CERTIFICATE OF SERVICE**

16 I hereby certify and affirm that this document was filed electronically with the
17 Nevada Supreme Court on February 15, 2018. Electronic Service of the foregoing
18 document shall be made in accordance with the Master Service List as follows:
19
20

21 ADAM PAUL LAXALT
22 Nevada Attorney General

STEVEN WOLFSON
Chief Deputy District Attorney

23
24 */s/ Amanda Gregory*

25 _____
26 An Employee of Gregory & Waldo, LLC
27
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