

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

2 * * * * *

3 NORMAN BELCHER

4 Appellant,

5 vs.

6 THE STATE OF NEVADA,

7 Respondent.

S.C. CASE NO. 72325

Electronically Filed
Sep 25 2017 02:03 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

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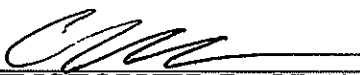
9 **MOTION FOR EXTENSION OF TIME TO FILE OPENING BRIEF**

10 COMES NOW, Christopher R. Oram, Esq., attorney for Appellant,
11 NORMAN BELCHER, and moves this Court for an Order granting an extension of
12 time of ninety (90) days from the date the Opening Brief is now due, to wit:
13 September 25, 2017, and extend the time to and including, December 26, 2017, for
14 the filing of the Opening Brief. This motion is made and based upon NRAP 27 and
15 31(a), the Affidavit of Christopher R. Oram, Esq., filed herewith, and the Points
16 and Authorities attached hereto.

17 DATED this 25th day of September, 2017.

18

19 Respectfully submitted by:

20 
21 CHRISTOPHER R. ORAM, ESQ.
22 Nevada Bar No. 004349
23 520 S. Fourth Street, 2nd Floor
24 Las Vegas, Nevada 89101
25 (702) 384-5563

26 Attorney for Appellant
27 NORMAN BELCHER

28

CHRISTOPHER R. ORAM, LTD.
520 SOUTH 4TH STREET | SECOND FLOOR
LAS VEGAS, NEVADA 89101
TEL. 702.384-5563 | FAX. 702.974-0623

POINTS AND AUTHORITIES

Time for Serving and Filing Briefs.

The appellant shall serve and file the OPENING brief within one hundred and twenty (120) days after the date on which the appeal is docketed in the Supreme Court. The respondent shall serve and file his answering brief within thirty (30) days after service of the brief of the appellant. After service of respondent's brief, any OPENING brief must be served and filed within thirty (30) days. . . . By written stipulation timely filed with the Supreme Court, the parties may extend the time for filing any brief for a total of thirty (30) additional days unless the court otherwise orders. Applications for extensions of time beyond that to which the parties are permitted to stipulate are not favored, and will be considered only on motion for good cause clearly shown, or ex parte in cases of extreme and unforeseeable emergency. The Supreme Court may shorten the periods prescribed above for serving and filing briefs, either by rule for all cases or for classes of cases, or by order for specific cases."

Mr. Belcher's Opening Brief is currently due on September 25, 2017. This is the first request for an extension of time. Mr. Belcher is facing a sentence of death. Mr. Belcher has many pertinent issues to present in the Opening Brief.

The undersigned recognizes that ninety (90) days is a lengthy extension, but such an extension is necessary for counsel to submit a proper Opening Brief. Given the voluminous nature and complexity of this case, such an extension of time is necessary to review and draft the Opening Brief. The Record on Appeal in this case spans over ten thousand pages. The undersigned will need to review the record, including the entire trial in order to draft the facts and arguments necessary for the Opening Brief. Moreover, the undersigned was not trial counsel and is thus not familiar with the case.

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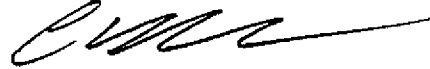
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1 Therefore, counsel respectfully request that this Court permit him an
2 additional ninety (90) days in order to properly brief these issues.

3 DATED this 25th day of September, 2017.

4 Respectfully submitted by:

5 

6 CHRISTOPHER R. ORAM, ESQ.
7 Nevada Bar #004349
8 520 S. Fourth Street, 2nd Floor
9 Las Vegas, Nevada, 89101

10 Attorney for Appellant
11 NORMAN BELCHER
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AFFIDAVIT OF CHRISTOPHER R. ORAM
IN SUPPORT OF MOTION FOR EXTENSION OF TIME
TO FILE OPENING BRIEF

STATE OF NEVADA }
COUNTY OF CLARK } ss:

CHRISTOPHER R. ORAM, ESQ., being first duly sworn, deposes and states:

1. I am an attorney duly licensed to practice law in the State of Nevada. I am counsel for the Appellant in the above-entitled matter. I have personal knowledge of all matters contained herein and am competent to testify thereto.

2. Mr. Belcher's Opening Brief is currently due on September 25, 2017. This is the first request for an extension of time. Mr. Belcher is facing a sentence of death. Mr. Belcher has many pertinent issues to present in the Opening Brief.

The undersigned recognizes that ninety (90) days is a lengthy extension, but such an extension is necessary for counsel to submit a proper Opening Brief. Given the voluminous nature and complexity of this case, such an extension of time is necessary to review and draft the Opening Brief. The Record on Appeal in this case spans over ten thousand pages. The undersigned will need to review the record, including the entire trial in order to draft the facts and arguments necessary for the Opening Brief. Moreover, the undersigned was not trial counsel and is thus not familiar with the case.

Therefore, counsel respectfully request that this Court permit him an additional ninety (90) days in order to properly brief these issues.

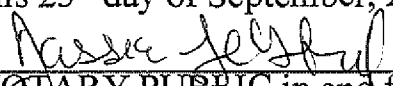
3. That this motion is made in good faith and not for purposes of delay.

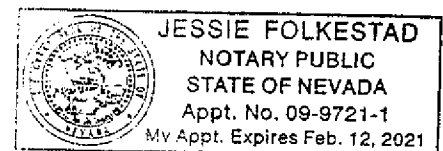
FURTHER YOUR AFFIANT SAYETH NAUGHT.

DATED this 25th day of September, 2017.


CHRISTOPHER R. ORAM, ESQ.

SWORN and SUBSCRIBED before me
this 25th day of September, 2017.


NOTARY PUBLIC in and for said County and State



CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on September 25, 2017. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

ADAM PAUL LAXALT
Nevada Attorney General

STEVE OWENS
Chief Deputy District Attorney

CHRISTOPHER R. ORAM, ESQ.

BY:

/s/ Jessie Folkestad
An Employee of Christopher R. Oram, Esq.