

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  
Feb 28 2018 08:57 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

8  
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  
12                   of time of twenty-one (21) days from the date the Opening Brief is now due, to  
13                   wit: February 28, 2018, and extend the time to and including, March 21, 2018, for  
14                   the filing of the Opening Brief. This motion is made and based upon NRAP 27  
15                   and 31(a), the Affidavit of Christopher R. Oram, Esq., filed herewith, and the  
16                   Points and Authorities attached hereto.

17                   DATED this 28<sup>th</sup> day of February, 2018.

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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 4<sup>TH</sup> STREET | SECOND FLOOR  
LAS VEGAS, NEVADA 89101  
TEL. 702.384-5563 | FAX. 702.974-0623

1 **POINTS AND AUTHORITIES**

2 Time for Serving and Filing Briefs.

3 The appellant shall serve and file the OPENING brief  
4 within one hundred and twenty (120) days after the date  
5 on which the appeal is docketed in the Supreme Court.  
6 The respondent shall serve and file his answering brief  
7 within thirty (30) days after service of the brief of the  
8 appellant. After service of respondent's brief, any  
9 OPENING brief must be served and filed within thirty  
10 (30) days. . . . By written stipulation timely filed with  
11 the Supreme Court, the parties may extend the time for  
12 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.

13 Mr. Belcher's Opening Brief is currently due on February 28, 2018. This is  
14 the third request for an extension of time. Mr. Belcher is facing a sentence of  
15 death. Mr. Belcher has many pertinent issues to present in the Opening Brief.  
16 Given the voluminous nature and complexity of this case, such an extension of  
17 time is necessary to review and draft the Opening Brief. The Record on Appeal in  
18 this case spans over ten thousand pages and 44 volumes. Of note, the undersigned  
19 was not trial counsel and is thus not familiar with the case.

20 The undersigned has been working extremely diligently. The undersigned  
21 has reviewed thousands of pages and is currently about 5,300 pages in. The trial  
22 in the instant case runs through bates stamp 6,400. Thus, the undersigned is about  
23 1,100 pages away from finishing the entire trial. While combing through  
24 thousands of pages, the undersigned has noted numerous issues that must be  
25 brought to this Court's attention and has been continuously drafting the statement  
of facts.

26 Additionally, although this Court has stated that counsel's caseload will not  
27 be deemed a circumstance for an extension, the undersigned submits that his  
28 diligence in working on the instant case and other cases is demonstrated by the  
appellate briefs recently submitted: *State v. Castro*, 74013 (Opening Brief and

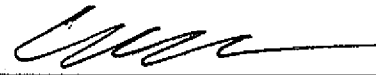
1 Appendix); *State v. Biela*, 71427 (Reply Brief in a capital case); *State v. Sitton*,  
2 73014 (Opening Brief in a capital case); *State v. Thomas*, 71044 (Reply Brief);  
3 *State v. Moshtaghian*, 96C135167 (Reply Brief); *State v. Amati*, 73577 (Opening  
4 Brief and Appendix), *State v. Uceda*, 72137, (Petition for Rehearing); *State v.*  
5 *Estrada*, 72136 (Reply Brief); *State v. Lyons*, 72743 (Reply Brief) and *State v.*  
6 *Stevens*, 74317 (Opening Brief and Appendix).

7 The undersigned apologizes for seeking an additional extension, however,  
8 it is extremely needed due to the voluminous and complex nature of this capital  
9 murder case. Additionally, the undersigned is only seeking a short extension of  
10 twenty-one (21) days.

11 Therefore, counsel respectfully request that this Court permit him an  
12 additional twenty-one (21) days in order to properly brief these issues.

13 DATED this 28<sup>th</sup> day of February, 2018.

14  
15 Respectfully submitted by:

16   
17 CHRISTOPHER R. ORAM, ESQ.  
18 Nevada Bar #004349  
19 520 S. Fourth Street, 2nd Floor  
20 Las Vegas, Nevada, 89101

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Attorney for Appellant  
NORMAN BELCHER

**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 February 28, 2018. This is the third 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. 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 and 44 volumes. Of note, the undersigned was not trial counsel and is thus not familiar with the case.

The undersigned has been working extremely diligently. The undersigned has reviewed thousands of pages and is currently about 5,300 pages in. The trial in the instant case runs through bates stamp 6,400. Thus, the undersigned is about 1,100 pages away from finishing the entire trial. While combing through thousands of pages, the undersigned has noted numerous issues that must be brought to this Court's attention and has been continuously drafting the statement of facts.

Additionally, although this Court has stated that counsel's caseload will not be deemed a circumstance for an extension, the undersigned submits that his diligence in working on the instant case and other cases is demonstrated by the appellate briefs recently submitted: *State v. Castro*, 74013 (Opening Brief and Appendix); *State v. Biela*, 71427 (Reply Brief in a capital case); *State v. Sitton*, 73014 (Opening Brief in a capital case); *State v. Thomas*, 71044 (Reply Brief); *State v. Moshtaghian*, 96C135167 (Reply Brief); *State v. Amati*, 73577 (Opening

1 Brief and Appendix), *State v. Uceda*, 72137, (Petition for Rehearing); *State v.*  
2 *Estrada*, 72136 (Reply Brief); *State v. Lyons*, 72743 (Reply Brief) and *State v.*  
3 *Stevens*, 74317 (Opening Brief and Appendix).

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6 murder case. Additionally, the undersigned is only seeking a short extension of  
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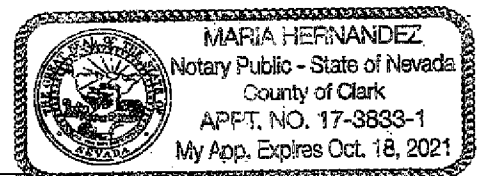
10 3. That this motion is made in good faith and not for purposes of delay.

11 FURTHER YOUR AFFIANT SAYETH NAUGHT.

12 DATED this 28<sup>th</sup> day of February, 2018.

13   
14 CHRISTOPHER R. ORAM, ESQ.

15  
16 SWORN and SUBSCRIBED before me  
17 this 28<sup>th</sup> day of February, 2018.



18   
19 NOTARY PUBLIC in and for said County and State  
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify and affirm that this document was filed electronically with  
3 the Nevada Supreme Court on February 28, 2018. Electronic Service of the  
4 foregoing document shall be made in accordance with the Master Service List as  
5 follows:

6 ADAM PAUL LAXALT  
7 Nevada Attorney General

8 STEVE OWENS  
9 Chief Deputy District Attorney

10 CHRISTOPHER R. ORAM, ESQ.

11 BY:

12  
13 /s/ Maria Hernandez  
14 An Employee of Christopher R. Oram, Esq.  
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