1	IN THE SUPREME COURT OF THE STATE OF NEVADA	
2 3		
4	NORMAN BELCHER Appellant,	S.C. CASE NO. 72325 Electronically Filed Oct 03 2018 09:53 a.m.
5	vs.	Elizabeth A. Brown Clerk of Supreme Court
6 7	THE STATE OF NEVADA,	
8	Respondent.	
9	UNTIMELY MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF	
10	COMES NOW Christopher R Oram Esq. attorney for Appellant	

NORMAN BELCHER, and moves this Court for an Order granting an extension of time of sixty (60) days from the date the Reply Brief was due, to wit: October 2, 2018, and extend the time to and including, December 3, 2018, for the filing of the Reply Brief. This motion is made and based upon NRAP 27 and 31(a), the Affidavit of Christopher R. Oram, Esq., filed herewith, and the Points and Authorities attached hereto.

DATED this 3rd day of October, 2018.

Respectfully submitted by:

<u>/s/ Christopher R. Oram, Esq.</u> CHRISTOPHER R. ORAM, ESQ. Nevada Bar No. 004349 520 S. Fourth Street, 2nd Floor Las Vegas, Nevada 89101 (702) 384-5563

Attorney for Appellant NORMAN BELCHER

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.

POINTS AND AUTHORITIES

Mr. Belcher's Reply Brief was due on October 2, 2018. The undersigned sincerely apologizes for submitting this extension late. The undersigned believed the motion was submitted on the due date, but failed to realize that the motion never went through the filing system. The next morning, upon realizing the motion had not been submitted, counsel immediately submitted the instant request. The undersigned apologizes for any inconvenience this may have caused the court.

This is the first request for an extension of time. Mr. Belcher is facing a sentence of death. Mr. Belcher has many pertinent issues before this Court. Given the voluminous nature and complexity of this case, such an extension of time is necessary. This is especially true given that counsel must review the Opening and Answering Brief and the record in this case prior to drafting the Reply (91 and 148 pages respectively).

- 25 /// 26 ///
- 27 ///
- 28 ///
 - ///

CHRISTOPHER R. ORAM, LTD. 520 SOUTH 4TH STREET | SECOND FLOOR Las VEGAS, NEVADA 89101 Tel. 702.384-5563 | FAX. 702.974-0623 1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

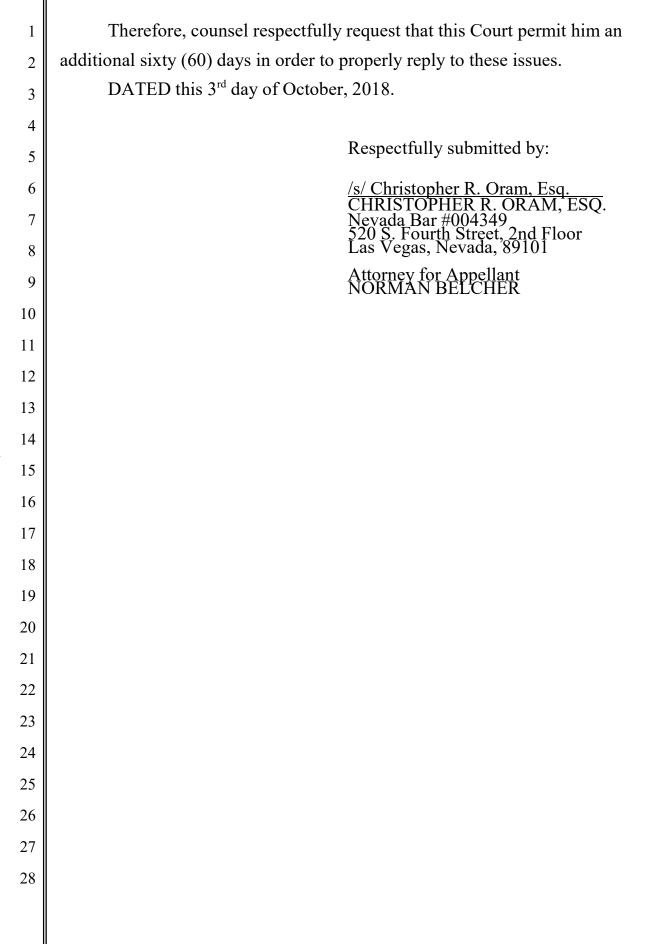
20

21

22

23

24



CHRISTOPHER R. ORAM, LTD. 520 SOUTH 4TH STREET | SECOND FLOOR Las Vegas, Nevada 89101 Tel. 702.384-5563 | Fax. 702.974-0623

AFFIDAVIT OF CHRISTOPHER R. ORAM IN SUPPORT OF MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF

STATE OF NEVADA COUNTY OF CLARK

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

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 Reply Brief was due on October 2, 2018. The undersigned sincerely apologizes for submitting this extension late. The undersigned believed the motion was submitted on the due date, but failed to realize that the motion never went through the filing system. The next morning, upon realizing the motion had not been submitted, counsel immediately submitted the instant request. The undersigned apologizes for any inconvenience this may have caused the court.

This is the first request for an extension of time. Mr. Belcher is facing a sentence of death. Mr. Belcher has many pertinent issues before this Court. Given the voluminous nature and complexity of this case, such an extension of time is necessary. This is especially true given that counsel must review the Opening and Answering Brief and the record in this case prior to drafting the Reply (91 and 148 pages respectively).

Therefore, counsel respectfully request that this Court permit him an additional sixty (60) days in order to properly reply to these issues.

CHRISTOPHER R. ORAM, LTD. 520 SOUTH 4TH Street | Second Floor Las Vegas, Nevada 89101 Tel. 702.384-5563 | Fax. 702.974-0623 1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

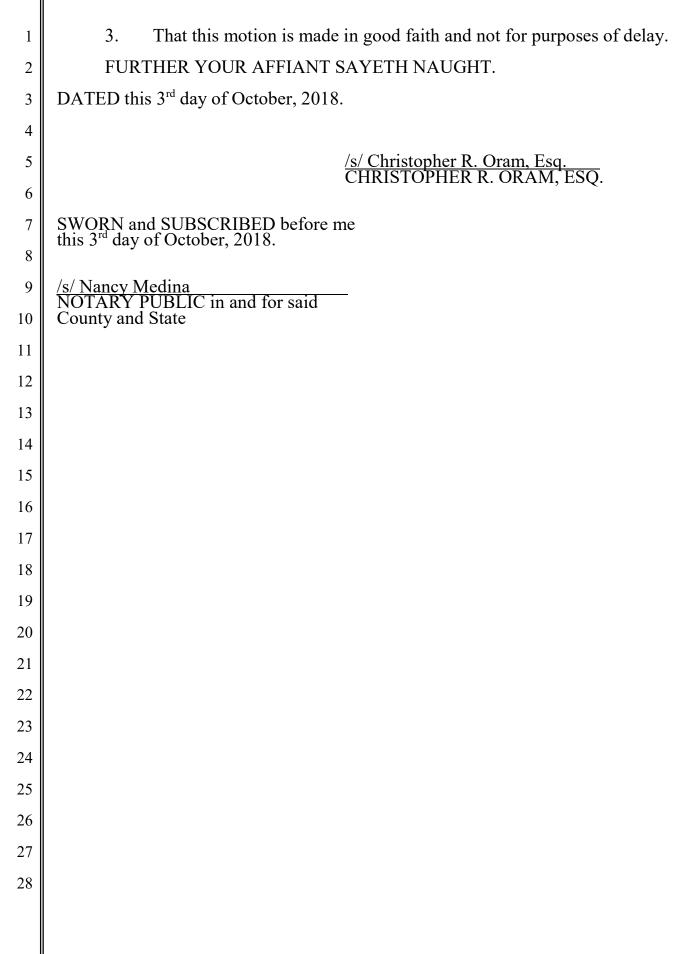
///

///

///

///

///



CHRISTOPHER R. ORAM, LTD. 520 SOUTH 4TH STREET | SECOND FLOOR Las Vegas, Nevada 89101 Tel. 702.384-5563 | Fax. 702.974-0623

