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Elizabeth A. Brown
Clerk of Supreme Court

IN THE SUPREME COURT OF THE STATE OF NEVADA

IVONNE CABRERA,)	
)	Case No.: 74341
Appellant,)	
)	MOTION TO LATE FILE and
vs.)	MOTION FOR
)	RECONSIDERATION OF SIXTH
THE STATE OF NEVADA,)	REQUEST FOR ADDITIONAL
)	TIME TO FILE OPENING BRIEF
Respondent.)	AND APPENDIX
_____)	

COMES NOW, Patricia M. Erickson, counsel for Appellant Ivonne Cabrera, and respectfully requests this Court enter an order, pursuant to N.R.A.P. 26(b), permitting the late filing of this motion and requesting the Court reconsider counsel's sixth motion based upon a miscommunication regarding the factual basis for the motion.

Initially, counsel requests permission to late file the present motion based upon the fact that counsel never saw the Court's June 20th order denying the sixth motion for additional time until 6:20 a.m. today.

At this time, undersigned counsel wanted to review the language of this Court's order regarding the disposition of the fifth motion for additional time to file Ms. Cabrera's pleadings. Counsel found that she had not downloaded the order granting her fifth motion to Ms. Cabrera's computer file. Therefore, counsel went online to download that order and was shocked to find that this Court had filed an order denying the sixth motion for additional time on June 20, 2018. This order also required counsel to file Ms. Cabrera's opening brief and appendix by June 25, 2018.

Given the fact that both the sixth motion for additional time and the order denying the motion were filed on June 20th, it appears that undersigned counsel did not realize that one of the emails generated on that date was based on the filing of this Honorable Court's order.¹

Counsel is filing the present motion as soon as she realized that she had not complied with the June 20th order. Based upon these facts, it is respectfully requested that this Court permit the late filing of this motion for reconsideration of the sixth motion for additional time to file Ms. Cabrera's Opening Brief.

¹ Three emails are generated when undersigned counsel efiles a pleading. Inadvertently, undersigned counsel failed to notice that four emails were generated on June 20, 2018.

This motion for reconsideration is based upon the fact that while undersigned counsel did state that she was suffering from extreme fatigue, counsel believes that she must have miscommunicated the basis for the fatigue. On June 15, 2018, undersigned counsel was diagnosed with a serious illness.² One of the symptoms of the illness is extreme fatigue.³ On June 15, 2018, counsel was prescribed two new medications which have begun to lessen the fatigue.

Based upon these new medications and counsel's response to them, counsel believes that she will be able to finalize preparation of Ms. Cabrera's opening brief and appendix on or before July 3, 2018.

Based upon the forgoing, undersigned counsel respectfully requests this Honorable Court reconsider the sixth motion for additional time and find that this medical issue is an extraordinary circumstance which establishes extreme need for additional time to finalize Ms. Cabrera's pleadings.

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² Counsel has been referred to a specialist to determine the course of treatment for the illness. The first appointment with the specialist has been scheduled for July 5, 2018.

³ Other symptoms of the illness that counsel has/is experiencing: frequent vomiting, digestion abnormalities, dizziness, pain in the abdomen and edema.

Additionally, undersigned counsel respectfully requests this Honorable Court enter an order extending the date for the filing of Ms. Cabrera's pleadings to and including July 3, 2018.

DATED this 26th day of June, 2018.

Respectfully Submitted,

/s/ Patricia M. Erickson
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CERTIFICATE OF SERVICE

I hereby certify that this document was filed electronically with the Nevada Supreme Court on the 26th day of June, 2018. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Steven Owens, Clark County Chief Deputy District Attorney

Adam Laxalt, Attorney General

Patricia M. Erickson

/s/ Patricia M. Erickson
Patricia M. Erickson