Patricia M. Erickson, Esq.
Nevada Bar No. 3506
601 South Tenth Street, Suite 108
Las Vegas, Nevada 89101
(702) 388-1055
pme@pmericksonlaw.com
Counsel for Appellant:
IVONNE CABRERA

Electronically Filed Dec 03 2018 07:38 a.m. Elizabeth A. Brown Clerk of Supreme Court

IN THE SUPREME COURT OF THE STATE OF NEVADA

IVONNE CABRERA,	
Appellant,) Case No.: 74341) MOTION FOR ADDITIONAL
vs.	TIME TO FILE REPLY BRIEF
THE STATE OF NEVADA,)) (Third Request)
Respondent.))

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), extending the time within which to file Ms. Cabrera's Reply Brief which is due to be filed on November 30, 2018.

By this Motion, counsel for Appellant Cabrera requests an additional seven (7) days within which to file the reply brief. If this Honorable Court grants this request, Ms. Cabrera's pleading will be due to be filed on or before December 11, 2018.

As has been previously written, this appeal presents this Honorable Court with several first impression questions regarding the application of a duress defense to capital murder, non-capital crimes¹ and felony murder. This appeal also presents a request to review the granting of trial continuances requested solely by a co-defendant in order to complete penalty phase investigation when another party to the trial objects and requests a speedy trial.

While undersigned counsel has researched and written the vast majority of the reply brief, illness and computer malfunction precluded her from being able to finalize Ms. Cabrera's brief by November 30, 2018.

///

///

///

///

///

///

Specifically the crimes of conspiracy to commit murder, burglary while in possession of a firearm and attempt murder with use of a deadly weapon.

Based upon the importance of the duress issues presented by this appeal, it is respectfully requested that this Honorable Court grant the present motion and order that the reply brief shall be filed on or before December 11, 2018.

DATED this 30th day of December, 2018.

Respectfully Submitted,

/s/ Patricia M. Erickson
Patricia M. Erickson, Esq.
Nevada Bar No. 3506
601 South Tenth St., Suite 108
Las Vegas, NV 89101
(702) 388-1055
pme@pmericksonlaw.com
Counsel for Appellant:
IVONNE CABRERA

CERTIFICATE OF SERVICE

I hereby certify that this document was filed electronically with the Nevada Supreme Court on the 30th day of December, 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