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Elizabeth A. Brown
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IN THE SUPREME COURT OF THE STATE OF NEVADA

IVONNE CABRERA,)	
)	Case No.: 74341
Appellant,)	
)	SUPPLEMENT TO THE THIRD
vs.)	MOTION FOR ADDITIONAL
)	TIME TO FILE REPLY BRIEF
THE STATE OF NEVADA,)	SUBMITTED ON 11.30.2018
)	
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 was due to be filed on November 30, 2018.

On November 30, 2018, undersigned counsel submitted a third motion for additional time to file Ms. Cabrera's reply. This motion requested an additional seven (7) days within which to file the reply brief. The basis for this request for additional time was illness and computer malfunction.

Today's Supplement requests an additional twenty one (21) days to file the reply. If this Honorable Court grants the present motion, Ms. Cabrera's pleading will be due to be filed on January 2, 2019. While, counsel recognizes that she has already requested an additional sixty seven (67) days to file Ms. Cabrera's reply, she is now required to have a new hard drive installed in her computer before she can finalize Ms. Cabrera's reply.

Given the upcoming holidays, the requested twenty one (21) days will (1) permit counsel's IT repair company to install a new hard drive and (2) give counsel time to finalize the preparation of the reply brief after the hard drive is installed.

The following facts establish that this request for an additional twenty one (21) days is based upon extreme and extraordinary circumstances.

Prior to filing of the third motion, undersigned counsel was having trouble with her computer - the cursor was not remaining in the sentence where the words of the document were being written. The technician spent 1.5 hours working online on counsel's computer, found multiple viruses which were removed. The problem of the moving cursor appeared to be fixed.

Unfortunately, the problem was not solved but subsequently incrementally increased.

For example, at this part of the present pleading, undersigned counsel has had to move the cursor back to the sentence being written twenty nine (29) times.

Further unless undersigned counsel is looking at the document that is being written, as she is now, recognizing that the cursor is no longer at the point where writing is being inputted doesn't occur immediately. For example, when counsel is writing while looking at another document, such as a court opinion or a document in the appendix, she may not see that none of the words that she thought were being written were actually written. Once this problem is recognized, counsel is required to re-write the information that she previously wrote. This problem has become extremely time consuming.¹

On Friday December 7, 2018, undersigned counsel again contacted her IT technician who determined that the cursor problem requires the installation of a new hard drive.

Subsequent to learning that a new hard drive is required, undersigned counsel hoped to work through this problem and finalize on Ms. Cabrera's reply by December 11, 2018. But the reply wasn't finalized by yesterday.

¹ At the present point of this pleading, undersigned counsel has expended one hour and twenty minutes writing information which should have taken no more than fifteen (15) minutes.

Therefore, undersigned counsel is requesting an additional twenty one (21) days so that a new hard drive can be installed and counsel will have enough time to finalize Ms. Cabrera's reply.

Based upon the importance of the duress issues presented by this appeal, it is respectfully requested that this Honorable Court grant the November 30, 2018 motion, as supplemented by the present information, and order that the reply brief shall be filed on or before January 2, 2019.

DATED this 12th day of December, 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 12th 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