

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
Jan 03 2019 09:09 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

IN THE SUPREME COURT OF THE STATE OF NEVADA

IVONNE CABRERA,)	
)	Case No.: 74341
Appellant,)	
)	
vs.)	MOTION FOR ADDITIONAL
)	TIME TO FILE REPLY BRIEF
THE STATE OF NEVADA,)	
)	Fifth 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 was due to be filed on January 2, 2019.

This motion requests an additional seven (7) days within which to file the reply brief. If this Honorable Court grants the present motion, Ms. Cabrera's pleading will be due to be filed on January 11, 2019.

///

On December 12, 2018, undersigned counsel informed this Honorable Court that she was required to have a new hard drive installed in her computer. The installation of the hard drive was completed on December 21, 2018.

Within two days of picking up the computer, undersigned counsel began to be ill. Although counsel saw her physician, was prescribed an antibiotic, a course of prednisone pills and shot and cough syrup, counsel feels worse today than on December 26, 2018 when she saw her physician. Due to this illness, counsel has remained at her home since December 25, 2018. Moreover, the congestion that undersigned counsel is experiencing has made it almost impossible for counsel to focus on finalizing Ms. Cabrera's reply.

It is respectfully submitted that the above facts of illness establish extraordinary circumstances and extreme need for an additional seven (7) days within which to file Ms. Cabrera's reply brief.

///

///

///

///

///

Moreover, based on 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 January 11, 2019.

DATED this 2nd day of January, 2019.

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 2nd day of January, 2019. 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