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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 FOR ADDITIONAL
vs.)	TIME TO FILE THE PETITION
)	FOR REHEARING
THE STATE OF NEVADA,)	
)	First 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 Petition for Rehearing which is due to be filed on January 13, 2020.

By this Motion, counsel for Appellant CABRERA requests an additional ten (10) days within which to file Ms. CABRERA's pleading. If this Honorable Court grants this request, Ms. CABRERA's Petition will be due to be filed on or before January 23, 2020.

This motion is made and based upon the fact that undersigned counsel believes this Honorable Court misapprehended the as applied constitutional challenge to the preclusion of a duress defense to the capital murder charges as presented in the opening and reply briefs. Undersigned counsel included several cases supporting this argument in the briefs. Based on the importance of this issue to Ms. CABRERA, counsel believes that she needs to complete additional research in order to provide this Honorable Court with as complete a legal analysis as is possible.

Based upon the forgoing, it is respectfully requested that the Honorable Court grant the present motion and order that the Petition for Rehearing shall be filed on or before January 23, 2020.

DATED this 13th day of January, 2020.

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 13th day of January, 2020. 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