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## 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,	
)	Second 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 23, 2020.

By this Motion, counsel for Appellant CABRERA requests an additional seven (7) 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 30, 2020. This motion is made and based upon the fact, as set forth in the first request for additional time, that undersigned counsel believes this Honorable Court misapprehended the <u>as applied</u> constitutional challenge to the preclusion of a duress defense to the capital murder charges presented in this appeal. Counsel has completed significant additional research since she submitted her first request for additional time. However, undersigned counsel needs additional time now to synthesize the research and write the Petition for Rehearing.

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 30, 2020.

DATED this <u>23<sup>rd</sup></u> day of January, 2020.

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 <u>23<sup>rd</sup></u> 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

Aaron Ford, Attorney General

Patricia M. Erickson

/s/ Patricia M. Erickson Patricia M. Erickson