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Appellant,

THE STATE OF NEVADA,

Respondent.

**APPELLANT FREDYS A. MARTINEZ'S MOTION FOR ENLARGMENT OF TIME
TO FILE DOCKETING STATEMENT**

Comes Now Appellant FREDYS A. MARTINEZ, by and through his attorney BETSY ALLEN, Esq., and moves for an enlargement of time of FOURTEEN (14) days to file the DOCKETING STATEMENT in this case. The grounds for this request are described in the attached Declaration.

DATED this 9th day of June, 2018.

LAW OFFICE OF BETSY ALLEN

By: /s/ Betsy Allen
BETSY ALLEN, ESQ.
Nevada Bar No. 6878
P.O. Box 46991
Las Vegas, Nevada 89114
(702) 386-9700

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DECLARATION OF BETSY ALLEN

- 1. I am an attorney licensed to practice law in the State of Nevada.
- 2. Counsel for Appellant filed a Notice of Appeal to the Nevada Supreme Court (dated April 27, 2018).
- 3. Counsel has previously requested no continuances in this matter.
- 4. Counsel for Appellant miscalculated the days in which the Docketing Statement needed to be filed.
- 5. Counsel will not request another enlargement of time as the docketing statement is being filed contemporaneously with this Motion.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on the 9th day of June, 2018.

/s/ Betsy Allen
BETSY ALLEN, ESQ