

Electronically Filed
Mar 18 2019 01:25 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Appellant,

VS.

Respondent.

COMES NOW the Appellant, JANET SOLANDER, by and through her attorneys, KRISTINA WILDEVELD, ESQ., and CAITLYN MCAMIS, ESQ., of The Law Offices of Kristina Wildeveld and moves this Honorable Court for a minimum thirty (30) day extension of the filing due date for filing Appellant's Opening Brief in the instant matter. The current deadline to file Appellant's Opening Brief is March 18, 2019. This extension requested in accordance to NRAP Rule 31(b)(3).

This Application is based upon the Statement of Counsel attached hereto.

DATED this 18th day of March, 2019.

Respectfully Submitted by:

/s/: Caitlyn McAmis

CAITLYN MCAMIS, ESQ.

Nevada Bar No. 012616

550 E. Charleston Blvd., Suite A

Las Vegas, Nevada 89104

(702) 222-0007

Attorney for Appellant, JANET SOLANDER

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1. That I am an attorney duly licensed to practice law in the State of Nevada and am employed as an associate attorney whose office has been appointed to represent Appellant, JANET SOLANDER, on her direct appeal currently pending before this Honorable Court.

3. That this matter involves the direct appeal following a forty-six (46) day trial over forty-six (46) counts that resulted in convictions and pertains to a matter of first impression in which the (contested) use of catheters on minor children was charged as a Sexual Assault.

4. That the transcripts from this jury trial are voluminous and are yielding a very large multi-volume appendix that requires careful citation to the record, which has been time consuming, and has yielded more information in the record that anticipated with Appellant's first Motion for Extension of Time.

5. That the Defense has conducted significant legal research in this matter, and that the additional time is requested in order to better analyze and reference appropriate case law in Appellant's Opening Brief.

1 6. That the Defense previously filed and was granted its First Request
2 for a Motion for Extension of Time in this matter after the first deadline of
3 December 18, 2018.

4 7. It is anticipated that all supplemental research and analysis for the
5 brief will be completed within the requested thirty (30) additional days.

6 8. That this subsequent request is made in order to provide effective
7 assistance of appellate counsel to Ms. Solander, who is subject to multiple Life
8 sentences as a result of a first-time theory of prosecution of this kind.

9 9. That a minimum of thirty (30) days extension from the current date of
10 March 18, 2019, is sufficient to properly produce and file Appellant's Opening
11 Brief and Appendix. This would make the new deadline to file the Opening Brief
12 and Appendix April 17, 2019.

13 10. That this request is made in good faith and not for an improper
14 purpose of undue delay.

15 I declare under penalty of perjury that the factual representations set forth in
16 this Declaration of Counsel are true and correct. Executed this 18th day of March,
17 2019.

18 /s/: Caitlyn McAmis
19 CAITLYN MCAMIS, ESQ.
20 Nevada Bar No. 012616

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STEVEN B. WOLFSON
Clark County District Attorney

STEVEN S. OWENS
Chief Deputy District Attorney

AARON FORD
Nevada Attorney General
Attorneys for Respondent

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