

IN THE SUPREME COURT OF THE STATE OF NEVADA

JOSHUA HONEA,

Appellant,

v.

STATE OF NEVADA,

Respondent.

Docket No. 76621

Electronically Filed
Dec 06 2018 04:37 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

MOTION FOR LEAVE TO FILE
54 PAGE OPENING BRIEF

COMES NOW Appellant, JOSHUA HONEA, by and through his counsel in this matter, MONIQUE A. MCNEILL, ESQ, and moves this Court for leave to file a 54 page Opening Brief. This motion is based upon the following Declaration and all papers and pleadings on file herein.

DATED this 7th day of December, 2018.

/s/ Monique McNeill
MONIQUE A. MCNEILL, ESQ
Nevada Bar No. 9862
P.O. Box 7559
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Attorney for Appellant Honea

DECLARATION

I, MONIQUE A. MCNEILL, ESQ, am a duly licensed attorney in the State of Nevada and am the Appellant's attorney in the above-captioned case. Appellant's Opening Brief is 54 words long, thereby exceeding the page limitation by 24 pages. Pursuant to NRAP 32(a)(7)(D)(i), this Court may grant a motion to exceed the page limitation upon a showing of diligence and good cause.

With respect to diligence and good cause, Appellant was tried fifty-two counts, in a trial that took approximately 15 days. Therefore, the statement of facts alone took a substantial portion of the brief.

While Appellant attempted to be concise, the issues required lengthy legal analysis and lengthy factual assertions due to the nature of the arguments asserted and the fact that this appeal arises out of a trial that took 15 days. Therefore, Appellant requests leave to file an Opening Brief containing 54 pages.

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This Motion is made in good faith and not for the purposes of undue delay.

I declare under penalty of perjury the factual representations set forth in the foregoing memorandum are true and correct.

DATED this 7th day of December, 2018.

/s/ Monique McNeill
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Attorney for Appellant Honea

CERTIFICATE OF SERVICE

I hereby certify that this Motion was filed electronically with the Nevada Supreme Court on the 7th Day of December, 2018. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

CATHERINE CORTEZ MASTO

STEVEN S. OWENS

DATED this 7th day of December, 2018.

/s/ Monique McNeill
MONIQUE A. MCNEILL, ESQ
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