## IN THE SUPREME COURT OF THE STATE OF NEVADA

<b>R</b> ,	)	Electronically Filed Jun 06 2017 02:03 p.m. Elizabeth A. Brown CASE NO.: 71401Clerk of Supreme Court	
	)		
Appellant,	)	E-FILE	
	)		
DA,	)		
	)		
Respondent.	)		
	)		
_	Appellant, DA,	Appellant, )  OA, )	) CASE NO.: 71401 Appellant, ) E-FILE ) DA, )

## **MOTION FOR ENLARGEMENT OF TIME**

COMES NOW Terrence M. Jackson, Esquire, the appointed appellate counsel, and moves this Court for an enlargement of time within which to file its Appellant's Opening Brief. This motion is based on the following memorandum and all papers and pleadings on file herein.

Dated this 6th of June, 2017.

Respectfully submitted,

/s/ Terrence M. Jackson

Terrence M. Jackson, Esquire

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Counsel for Appellant, Brandon Starr

## **MEMORANDUM**

I, TERRENCE M. JACKSON, am a duly licensed attorney in the State of Nevada, and am a sole practitioner in the Law Office of Terrence M. Jackson. The Appellant's Opening Brief is currently due on June 12, 2017. This is a direct appeal from a Judgement in Eighth Judicial District Court following a jury verdict of guilt.

This Court may extend the time to file an Opening Brief upon a clear showing of good cause. As such, the Defendant requests a thirty-day extension of time, up to and including July 12, 2017, within which to file the Opening Brief under NRAP 31(b)(3).

Terrence M. Jackson herein makes his second request for an enlargement of time. If granted, the new filing date for the Appellant's Opening Brief would be July 12, 2017.

This case has a lengthy history in the District Court. Defendant was convicted of over seventy (70) felony counts. Appellant's brief raises at least eight issues requiring detailed factual and legal inquiries. Defendant requires more time to assemble the approximately 3,000 page record and to accurately note all necessary citations to the record.

This motion is made in good faith and not for purposes of delay. Defendant is

acting with due diligence in preparing the Opening Brief.

Dated this 6th of June, 2017.

Respectfully submitted,

/s/ Terrence M. Jackson

Terrence M. Jackson, Esquire

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Counsel for Appellant, Brandon Starr

## **CERTIFICATE OF SERVICE**

I hereby certify and affirm I am an assistant in the office of Terrence M. Jackson, Esquire, a person of such age and discretion as to be competent to serve papers and that on the 6th of June, 2017, I served this Document, MOTION FOR ENLARGEMENT OF TIME, filed electronically with the Nevada Supreme Court by Electronic Service (*eFlex*) as follows:

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STEVEN B. WOLFSON
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ADAM LAXALT Nevada Attorney General 100 North Carson Street Carson City, NV 89701

And by U.S. Postal Service, first-class postage affixed to:

Brandon Starr, ID# 1165964 Ely State Prison P.O. Box 1989 Ely, NV 89301

By: /s/ Ila C. Wills

Assistant to Terrence M. Jackson, Esq.