

IN THE SUPREME COURT OF THE STATE OF NEVADA

\*\*\*\*\*

SIAOSI VANISI

Petitioner/Appellant,

vs.

WILLIAM GITTERE, Warden,  
Ely State Prison, AARON  
FORD, Attorney General of  
Nevada, et al.,

Respondents/Appellees.

Electronically Filed  
Jan 10 2020 01:42 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

Supreme Court No. 78209

District Court Case No. CR98-0516

(Death Penalty Habeas Corpus  
Case)

**REQUEST FOR EXTENSION OF TIME WITHIN WHICH  
TO FILE APPELLANT'S REPLY BRIEF**

Appellant, Siasosi Vanisi, by and through his counsel of record,  
hereby requests an extension of time of sixty (60) days to, and including,  
March 10, 2020, to file his Reply Brief.

///

///

///

This request is supported by the attached declaration of counsel.

DATED this 10th day of January, 2020.

Respectfully submitted,

/s/ *Randolph M. Fiedler*  
RANDOLPH M. FIEDLER  
Assistant Federal Public Defender  
Nevada Bar No. 12577  
411 E. Bonneville Ave., Suite 250  
Las Vegas, Nevada 89101  
702-388-6577

## DECLARATION OF RANDOLPH M. FIEDLER

I, Randolph M. Fiedler, declare as follows:

1. I am an attorney at law, admitted to practice before this Court and employed by the Capital Habeas Unit of the Federal Public Defender, District of Nevada. I am assigned to represent Siasosi Vanisi in this matter.

2. The Reply Brief is currently due today, January 10, 2020. I am seeking an extension of sixty (60) days, up to and including March 10, 2020 within which to file and serve this Reply Brief.

3. I am requesting this extension because case-related responsibilities have prevented me from devoting adequate time to prepare Mr. Vanisi's case. Specifically, since the State filed their Answering Brief on December 12, 2019, I have had the following obligations: a Reply to State's Response to Petition for Writ of Habeas Corpus (Post-Conviction), a Motion for Evidentiary Hearing, and a Motion for Leave to Conduct Discovery in *Johnson v. Gittere*, No. A-19-789336-W (8th Jud. Dist. Ct. Nev.) on December 13, 2019; a Motion for Leave to Conduct Discovery in *Adams v. Gittere*, No. 85C069704 (8th

Jud. Dist. Ct. Nev.) on Jan. 3, 2020. Additionally, I was out from December 24, 2019 through January 1, 2020 on pre-planned personal leave.

4. To fulfill my ethical obligations to Mr. Vanisi, I need additional time to prepare his Reply Brief. The extension requested here will allow me to complete this pleading in accordance with our office's duty to provide Mr. Vanisi with adequate representation and with our office's obligation to assist this Court in adjudicating Mr. Vanisi's case. This request is not made for the purposes of delay, or for any other improper purpose, but only to ensure that this office provides competent representation. Nev. R. Prof. Conduct. 1.1.

5. On January 10, 2020, I contacted opposing Counsel, Jennifer P. Noble, Chief Appellate Deputy, via e-mail. She indicated no opposition to this request.

///

///

///

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on January 10, 2020 in Las Vegas, Nevada.

DATED this 10th day of January, 2020.

Respectfully submitted,

/s/ *Randolph M. Fiedler*  
RANDOLPH M. FIEDLER  
Assistant Federal Public Defender  
Nevada State Bar No.  
411 E. Bonneville Ave., Suite 250  
Las Vegas, Nevada 89101  
702-388-6577

## CERTIFICATE OF SERVICE

I hereby certify that this document was filed electronically with the Nevada Supreme Court on the 10th day of January, 2020, electronic service of the foregoing REQUEST FOR EXTENSION OF TIME WITHIN WHICH TO FILE APPELLANT'S REPLY BRIEF shall be made in accordance with the Master Service List as follows:

Jennifer P. Noble  
Appellate Deputy  
jnoble@washoe.da.com

/s/ Sara Jelinek

An Employee of the Federal Public  
Defender, District of Nevada