

IN THE SUPREME COURT OF THE STATE OF NEVADA

TONEY A. WHITE,)

#1214172,)

Appellant,)

v.)

STATE OF NEVADA,)

Respondent.)

_____)

Electronically Filed
Sep 09 2019 12:15 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

CASE NO.: 78483

E-FILE

D.C. Case: C-16-313216-2

Dept.: XII

MOTION FOR ENLARGEMENT OF TIME

COMES NOW the Defendant, Toney A. White, by and through Terrence M. Jackson, Esquire, the appointed appellate counsel, and requests this Honorable Court for an enlargement of time of sixty (60) days within which to file the Appellant's Opening Brief and Appendix.

As grounds for this Motion, Defendant states he needs additional time to complete his Opening Brief and raise all legitimate issues. Defendant further states he believes the most important issue of the case, the validity of the Defendant's guilty

plea, is set for hearing in District Court for September 24, 2019.

Until those issues in that Motion are decided, Defendant cannot effectively raise the most significant issue on his appeal. Defense counsel has acted diligently at all times since appointed on this case and is not seeking an extension of time for the mere purpose of delay.

Dated this 9th of September, 2019.

Respectfully submitted,

/s/ Terrence M. Jackson

TERRENCE M. JACKSON, ESQ.

Nevada Bar No. 000854

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Counsel for Appellant Toney A. White

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 9th of September, 2019, 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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[X] And by U.S. Postal Service, first-class postage affixed to:

TONEY A. WHITE
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ELY STATE PRISON
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By: /s/ Ila C. Wills
Assistant to Terrence M. Jackson, Esq.