

1 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

2 CHRISTOPHER BLOCKSON,
3 Appellant,

4 vs.

5 THE STATE OF NEVADA,
6 Respondent.

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Oct 21 2019 10:52 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

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**MOTION FOR EXTENSION OF
TIME TO FILE APPELLANT'S
OPENING BRIEF AND APPENDIX
(FIRST REQUEST)**

10 **COMES NOW** the Appellant, CHRISTOPHER BLOCKSON, by and
11 through his attorney of record, Jason C. Makris, Esq., MOTION FOR
12 EXTENSION OF TIME TO FILE APPELLANT'S OPENING BRIEF AND
13 APPENDIX (FIRST REQUEST) until November 21, 2019 pursuant to NRAP 26
14 and NRAP 27.

15 **DATED** this 21st day of October, 2019.

16 Respectfully submitted,

17 **JASON C. MAKRIS, ESQ.**

18 /s/ Jason C. Makris
19 JASON C. MAKRIS, ESQ.
20 Nevada Bar No. 11192
21 MAKRIS LEGAL SERVICES, LLC
22 400 S. 4th Street, Suite 500
23 Las Vegas, Nevada 89101
24 *Appointed Attorney for Appellant*
25 CHRSTOPHER BLOCKSON
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2 **DECLARATION OF JASON C. MAKRIS, ESQ.**

3 **I, JASON C. MAKRIS, ESQ.,** do declare as follows:

4 1. Declarant is an attorney duly licensed to practice in the State of
5 Nevada.

6 2. On May 20, 2019, this Court filed a limited remand for designation of
7 Counsel by the Eighth Judicial District Court.

8 3. On May 23, 2019, Caesar Almase, Esq., was initially appointed as
9 Appellant Counsel for Appellant CHRISTOPHER BLOCKSON.

10 4. On June 05, 2019, this Court issued a Briefing Schedule for Appellant
11 to File an Opening Brief and Appendix.

12 5. On August 15, 2019, this Court granted a telephonic extension of time
13 to file Appellant's Opening Brief to August 29, 2019.

14 6. On August 23, 2019 and August 29, 2019, Notices were filed
15 regarding the Transcripts Requested from the Eighth Judicial District Court
16 Reporters in this matter.

17 7. On August 29, 2019, a Notice of Appearance as Appointed Appellate
18 Counsel was filed, which this Court granted on September 04, 2019 and Ordered
19 the Opening Brief filed by October 21, 2019.

20 8. Appellate Counsel was not Counsel for Appellant in the Eighth
21 Judicial District Court and is still reviewing the record from below in this matter to
22 determine all issues are properly raised in Appellant's Opening Brief based upon
23 the record below.

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9. Declarant is now asking this Court to provide an additional thirty days Pursuant to NRAP 26 and NRAP 27 and based upon good cause, in which to file the Opening Brief and Appendix.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

DATED this 21st day of October, 2019.

/s/ Jason C. Makris
JASON C. MAKRIS, ESQ.
 Nevada Bar No. 11192
MAKRIS LEGAL SERVICES, LLC
Appointed Attorney for Appellant
CHRISTOPHER BLOCKSON

MEMORANDUM OF POINTS AND AUTHORITIES

I.

PROCEDURAL HISTORY AND LEGAL AUTHORITY

RAP 26(b)(1) provides that “[f]or good cause, the court may extend the time prescribed by these rules or by its order to perform any act or may permit an act to be done after that time expires.” In addition, where a stipulation with the opposing party may not be obtained, NRAP 31(b)(3)(A) provides the requirements of all information that this Court requires in determining whether to grant an extension of time, including a demonstration of extraordinary and compelling circumstances. See NRAP 31(b)(3)(A)(iv).

Finally, NRAP 26(b)(1)(B) provides that a “[] grant of an extension of time to perform an act under this Rule will bar any further extensions of time to perform the same act unless the party files a written motion for extension of time demonstrating extraordinary and compelling reasons why a further extension of time is necessary.”

Appellant Counsel was not the Counsel for Appellant in the Eighth Judicial District Court, and is reviewing the underlying record in this matter to ensure that

1 all issues are properly raised before this Honorable Court. Therefore, to ensure
2 Appellant Counsel is effective, an additional thirty days (30) is requested to file the
3 opening brief and appendix.

4 **II.**

5 **CONCLUSION**

6 Therefore, Pursuant to NRAP 26 and NRAP 27, good cause supports this
7 Court's granting Appellant's Motion for Extension of Time to file the Opening
8 Brief and Appendix to November 21, 2019.

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/s/ Jason Makris
An Employee of Makris Legal Services, LLC