

CHRISTOPHER BLOCKSON,  
Appellant,

VS.

Electronically Filed  
Dec 20 2019 09:22 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

DOCKET NO: 7873

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

**COMES NOW** the Appellant, CHRISTOPHER BLOCKSON, by and through his attorney of record, Jason C. Makris, Esq., MOTION FOR EXTENSION OF TIME TO FILE APPELLANT’S OPENING BRIEF AND APPENDIX (THIRD REQUEST) until January 03, 2020 pursuant to NRAP 26 and NRAP 27.

**DATED** this 20th day of December, 2019.

Respectfully submitted,

**JASON C. MAKRIS, ESQ.**

/s/ Jason C. Makris  
**JASON C. MAKRIS, ESQ.**  
 Nevada Bar No. 11192  
**MAKRIS LEGAL SERVICES, LLC**  
 400 S. 4<sup>th</sup> Street, Suite 500  
 Las Vegas, Nevada 89101  
*Appointed Attorney for Appellant*  
**CHRISTOPHER BLOCKSON**

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

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

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

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

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

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

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

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

8. On October 21, 2019, Appellant Filed his Second Request for Extension of time which this court granted, providing until November 21, 2019, in which to file his Opening Brief and Appendix.

9. On November 26, 2019, this Court granted the Motion for Extension of Time, providing until December 20, 2019, to file Appellant's Opening Brief and Appendix.

10. On December 10, 2019, Appellant filed a Motion to Replace Counsel.

11. Although I have visited with Appellant and spoke with him over the phone, I am asking this Court to provide me an additional 14 days in which to resolve this issue with my client and file the Opening Brief.

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

**DATED** this 20th day of December, 2019.

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

***MEMORANDUM OF POINTS AND AUTHORITIES***

**I.**

**PROCEDURAL HISTORY AND LEGAL AUTHORITY**

NRAP 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.”

As noted above, despite the fact that Counsel has been in communication with Appellant, Counsel feels it is necessary to conduct a further visit with the

1 Appellant to ensure the attorney client relationship is intact. Therefore, Counsel is  
2 asking for an additional fourteen (14) days in which to file the Opening Brief.

3 **II.**

4 **CONCLUSION**

5 Therefore, Pursuant to NRAP 26 and NRAP 27, good cause supports this  
6 Court's granting Appellant's Motion for Extension of Time to file the Opening  
7 Brief and Appendix to January 03, 2020.

8 **DATED** this 20th day of December, 2019.

9  
10 /s/ Jason C. Makris  
11 JASON C. MAKRIS, ESQ.  
12 Nevada Bar No. 11192  
13 MAKRIS LEGAL SERVICES, LLC  
14 *Appointed Attorney for Appellant*  
15 CHRISTOPHER BLOCKSON  
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/s/ Jason Makris  
An Employee of Makris Legal Services, LLC