

IN THE SUPREME COURT OF THE STATE OF NEVADA

CHRISTIAN STEPHON MILES, )  
 )  
 Appellant, )  
 )  
 v. )  
 )  
 THE STATE OF NEVADA, )  
 )  
 Respondent. )  
 \_\_\_\_\_ )

No. 79554

Electronically Filed  
Feb 14 2020 09:31 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

MOTION FOR EXTENSION OF TIME  
TO FILE THE OPENING BRIEF  
(First Request)

Appellant, Christian Stephon Miles, moves for a 60-day extension of time to file the opening brief. *See* NRAP 31(b)(3). The opening brief is currently due next, Thursday, February 20, 2020. This is Miles’s first request for extension of time to file the opening brief. If this request is granted, the opening brief will be due on or before Monday, April 20, 2020.

*Grounds why an extension is necessary*

I, Mario D. Valencia, court-appointed appellate counsel for Miles did not represent him in the district court proceedings. Miles represented himself. Miles pleaded not guilty and took his case to trial. The jury trial lasted seven days.

Miles was charged with and convicted of the following crimes: Sex Trafficking of a Child under 18 Years of Age (Count 1), First Degree Kidnaping

(Count 2), Living from the Earnings of a Prostitute (Count 3), and Child Abuse, Neglect, or Endangerment (Count 4). The court sentenced Miles to the following: Count 1 — LIFE with a Minimum Parole Eligibility of Sixty (60) months; Count 2 — LIFE with a Minimum Parole Eligibility of Sixty (60) months, CONSECUTIVE to Count 1; Count 3 — a Maximum of Forty-Eight (48) months with a Minimum Parole Eligibility of Nineteen (19) months, CONSECUTIVE to Counts 1 & 2; and Count 4 — a Maximum of Seventy-Two (72) months with a minimum Parole Eligibility of Twenty-Four (24) months, CONSECUTIVE to Counts 1, 2, & 3; with 546 days credit for time served. The aggregate total sentence is LIFE with a minimum parole eligibility of One Hundred Sixty-Seven (167) months. Miles must also register as a sex offender in accordance with NRS 179D.460.

Miles's cases began in May 2015, when the Information was filed against him. His case did not go to trial, however, until April 2019, and he was not sentenced until September 2019.

There are about 200 filings in the district court proceedings, and about 80 transcripts, most of which I did not receive until December 2019. Since Miles represented himself, it has taken extra time and effort to gather as much of his file as possible, including the discovery, which consists of thousands of pages (e.g.,

phone records, text messages, Facebook pages and messages, online advertisements, in addition to police records and criminal records of the victim). I also had to order copies of the evidence admitted during the preliminary hearing and jury trial. Since the case went to trial, however, I must review everything that happened in the district court proceedings to determine what issues need to be raised on appeal, including constitutional issues to preserve Miles's rights should he lose his direct appeal and seek post-conviction relief.

As shown above, there is a lot of information to review and digest in order to be thoroughly familiar with the legal and factual issues in this case, and I am just one person. I am a sole practitioner. I currently have a very heavy workload. Nevertheless, I have been working diligently on this case, and will continue to do so, but I need more time to finish reviewing everything and to prepare the opening brief. In light of the amount of work that still needs to be done in this case, plus all of the other hearings, briefs, and professional obligations I have over the course of the next month and a half, I respectfully request a 60-day extension of time to file the opening brief. I will file the opening brief as soon as I can, however, which may be before the extra 60 days expire.

### Conclusion

The court should granted this motion and give Miles until April 20, 2020 to

file his opening brief. This is Miles's first request for extension. We are not filing this motion to delay the appeal, but out of necessity, as shown above. Moreover, counsel for Miles will file the brief as soon as possible, which may be before the additional 60 days requested in this motion have expired.

DATED: February 14, 2020.

/s/ Mario D. Valencia  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY AND AFFIRM that this document was filed electronically with the Nevada Supreme Court on February 14, 2020. Electronic service of the foregoing document shall be made in accordance with the Master Service List as follows:

AARON D. FORD  
Nevada Attorney General

ALEXANDER CHEN  
Chief Deputy District Attorney

/s/ Mario D. Valencia  
MARIO D. VALENCIA