

IN THE SUPREME COURT OF THE STATE OF NEVADA

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

No. 79554

Electronically Filed  
Jun 17 2020 03:51 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

MOTION FOR EXTENSION OF TIME  
TO FILE A REPLY BRIEF  
(First Request)

Appellant, Christian Stephon Miles, moves for a 30-day extension of time to file a reply brief. *See* NRAP 31(b)(3). The brief is currently due June 18, 2020 because the answering brief was filed on May 19, 2020. *See* NRAP 31(a)(1)(C). This is Miles' first request for extension of time to file a reply brief. If granted, the brief will be due Monday, July 30, 2020. *See* NRAP 26(a)(1)(c).

*Grounds why an extension is necessary*

I have read the State's answering brief. I have started researching and analyzing some of its claims in response to Miles' arguments in the opening brief, and I have started drafting certain parts of the reply brief. However, I will not be able to finish the reply brief by tomorrow, June 18, 2020.

I am a sole practitioner and over the last 30 days, since the State filed its

answering brief, I have had about ten hearings in some complex products liability cases, and numerous meetings with out-of-state co-counsel, plus I have had to research and draft several motions and replies due in those cases, draft and submit several proposed orders and reports and recommendations for the court's and discovery commissioner's signature, draft sentencing memoranda in a federal criminal case involving constitutional issues, meet with medical experts and work on finalizing a post-conviction petition in what was a capital murder case, prepare for a sentencing hearing in federal court on 6/22/2020, and work on a federal habeas petition in another murder case.

Nevertheless, as noted above, I have not been neglectful or dilatory in this case. I have started working on the reply brief, and I will be able to get it finalized and filed within the next 30 days, if not sooner. Parties can usually stipulate to a 30-day extension of time to file "any brief," and this request is within that allotted time frame.

Miles, therefore, respectfully requests this motion be granted, and he be

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given until Monday, July 20, 2020 to file a reply brief.

DATED: June 17, 2020.

/s/ Mario D. Valencia  
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 June 17, 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