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Elizabeth A. Brown
Clerk of Supreme Court

IN THE SUPREME COURT OF THE STATE OF NEVADA

JASON BOLDEN,

Appellant,

vs.

THE STATE OF NEVADA,

Respondent.

Docket No. 79715

**MOTION FOR EXTENSION OF TIME
TO FILE OPENING BRIEF AND AP-
PENDIX**

Appellant Jason Bolden, through appointed counsel Ben Nadig, hereby submits this Motion for Extension of Time to File Opening Brief and Appendix. This motion is not made for unnecessary delay or for any improper purpose.

DATED this 29 of January, 2020.

/s/ Ben Nadig

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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 On September 24, 2019, the Appellant initiated the instant appeal from
3 the Judgment of Conviction in Eighth Judicial District Court case number C-
4 18-334635-1. Counsel filed a Transcript Request with the district court on
5 the same date. To date, those transcripts have not been filed in the case num-
6 ber below nor received by counsel. This motion follows.

7 The undersigned counsel has not yet received necessary transcripts.
8 The time allotted for the filing of the Opening Brief and Appendix will soon
9 expire. Counsel will require additional time to obtain those transcripts and
10 review them to the extent necessary to craft an effective appellate argument.
11 It should be noted that it is counsel's understanding that there is a new re-
12 porter in the originating judicial department in the district court, which may
13 necessitate additional time for filing those transcripts.

14 For these reasons, counsel would request an extension of time to file
15 the Opening Brief and Appendix in this appeal. The Opening Brief and Ap-
16 pendix are due January 29, 2020. Counsel would request an additional
17 ninety days with which to prepare and file the Opening Brief and Appendix,
18 resulting in an extension to April 28, 2020. This motion is made in good
19 faith and not for the purposes of unnecessary delay or for any improper basis.

20 DATED this 29 of January, 2020.

21 /s/ Ben Nadig

22 BEN NADIG

23 Nevada State Bar No. 9876

24 **LAW OFFICE OF BENJAMIN NADIG, CHTD.**

25 228 South Fourth Street, Suite 300

26 Las Vegas, NV 89101

27 (702) 545-7592

28 Counsel for Appellant

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I am a person competent to serve papers, that I am
3 not a party to the above-entitled action, and that on January 29, 2020, I
4 served the foregoing document via the Nevada Supreme Court's eFlex system
5 on the counsel and/or parties as listed below:
6

7 Name	Address
8 Steven B. Wolfson, Esq. 9 Steven S. Owens, Esq. Clark County District Attorney's Office	200 Lewis Ave. Las Vegas, NV 89155
10 Aaron D. Ford, Esq. 11 Nevada Attorney General's Office	100 N. Carson St. Carson City, NV 89701

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14

15 /s/ Ben Nadig
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Counsel for Appellant
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25 **AFFIRMATION**

26 Pursuant to NRS 239B.030, this document contains no social security numbers.

27 /s/ Ben Nadig
Ben Nadig

28 01-29-20
Date