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Electronically Filed
Apr 28 2020 01:24 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

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

10 JASON BOLDEN,

11 Appellant,

Docket No.

79715

12 *vs.*

13 THE STATE OF NEVADA,

14 Respondent.

**MOTION FOR EXTENSION OF TIME
TO FILE OPENING BRIEF AND
APPENDIX (SECOND REQUEST)**

15 Appellant Jason Bolden, through appointed counsel Ben Nadig, hereby
16 submits this Motion for Extension of Time to File Opening Brief and Appen-
17 dix (Second Request). This motion is not made for unnecessary delay or for
18 any improper purpose.

19
20
21 DATED this 28 of April, 2020.

22 /s/ Ben Nadig

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27 Las Vegas, NV 89101
28 (702) 545-7592
Counsel for Appellant

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. Notice of delivery of those transcripts was filed March 10,
6 2020. This motion follows.

7 The time allotted for the filing of the Opening Brief and Appendix will
8 soon expire. The undersigned counsel has now received the necessary tran-
9 scripts, but requires additional time to review them to the extent necessary
10 to craft an effective appellate argument. In light of the current circumstances
11 surrounding the COVID-19 pandemic, the difficulties of a sole practitioner in
12 these trying times have made drafting the opening brief in this case problem-
13 atic. When combined with the fact that the Appellant was found guilty of a
14 thirteen-count information and sentenced to a maximum of 160 years, coun-
15 sel submits that additional time is warranted for the drafting of an opening
16 brief.

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

23 DATED this 28 of April, 2020.

24 /s/ Ben Nadig

25 BEN NADIG

26 Nevada State Bar No. 9876

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

28 228 South Fourth Street, Suite 300

Las Vegas, NV 89101

(702) 545-7592

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 April 28, 2020, I served
4 the foregoing document via the Nevada Supreme Court's eFlex system on the
5 counsel and/or parties as listed below:
6

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

12
13
14

15 /s/ Ben Nadig
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(702) 545-7592
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

28 Ben Nadig

04-28-20

Date