

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

GUSTAVO RAMOS,  
Appellant,  
vs.  
THE STATE OF NEVADA,  
Respondent.

Electronically Filed  
Jan 29 2020 11:46 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

Supreme Court Case No. 79781

**MOTION FOR ENLARGEMENT OF TIME (FIRST REQUEST)**

COMES NOW, Appellant Gustavo Ramos, by and through his appointed counsel, Jamie Resch, Esq., and submits a Motion for Enlargement of Time (First Request) to file Appellant's Opening Brief. This motion is based on the following memoranda and all papers and pleadings on file herein.

DATED this 29th day of January, 2020.

RESCH LAW, PLLC d/b/a Conviction  
Solutions

By: / s / Jamie J. Resch  
JAMIE J. RESCH  
Attorney for Appellant  
2620 Regatta Dr. #102  
Las Vegas, Nevada 89128

## MEMORANDUM

I, JAMIE J. RESCH, am a duly licensed attorney in the State of Nevada, and am the attorney of record for the Appellant Gustavo Ramos in the above entitled case.

The appeal is from the District Court's conviction and sentence filed on September 20, 2019. The notice of appeal was filed on October 7, 2019.

Appellant's Opening Brief is currently due on February 7, 2020.

Appellant herein makes his first request for an enlargement of time of sixty (60) days to April 7, 2020, within which to file the Opening Brief. This Court may extend the time to file the opening brief upon a clear showing of good cause. NRAP 31(b)(3). Further extensions may be granted upon a showing of extraordinary circumstances and extreme need. Id.

Appellant's appeal arises from a lengthy and complicated procedural history, which includes a bench trial held over several days, and an extensive documental record. The transcripts alone appear to total approximately 1,200 pages. There are also many pleadings, likely a function

of the fact the State filed a notice of intent to seek the death penalty on January 24, 2011.

Counsel requires additional time to review the record and transcripts, and to prepare the opening brief. Counsel was able to personally meet with Mr. Ramos to discuss the appellate process and potential issues. However, counsel's pre-existing obligations require a first extension of time. Since November 2019, counsel has had to review voluminous records and write appellate briefs in multiple preexisting matters including (1) an opening brief in Knight v. State, Nevada Supreme Court #79603, (2) an answering brief in a death penalty case, State v. Watson, Nevada Supreme Court #78780, and (3) an opening brief in Gibbs v. Wilkie, Court of Appeals for Veterans Claim #19-4338, among all of counsel's other work. There simply has not been time to review the record and prepare Mr. Ramos' appeal, although doing so within the time of the requested extension would be a high priority if the extension is granted.

Mr. Ramos' appeal is complicated given that his was once a death penalty case, until the State agreed to drop the death penalty in exchange

for a bench trial. Therefore, Appellant hereby respectfully requests this Motion for Enlargement of Time (First Request) be approved moving the due date for the Opening Brief to April 7, 2020, in order to allow for a thorough review of the record and to provide quality briefing for this Court. This motion is made in good faith and not for the purposes of undue delay.

DATED this 29th day of January, 2020.

Respectfully submitted,

RESCH LAW, PLLC d/b/a Conviction  
Solutions

By: / s / *Jamie J. Resch*  
JAMIE J. RESCH  
Attorney for Appellant  
2620 Regatta Dr. #102  
Las Vegas, Nevada 89128  
(702) 483-7360

CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on the 29th day of January, 2020.

Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

STEVEN WOLFSON  
Clark County District Attorney  
Counsel for Respondent

AARON FORD  
Nevada Attorney General

By:                     /s/ Jamie Resch                      
An Employee of RESCH LAW, PLLC  
d/b/a Conviction Solutions