

IN THE SUPREME COURT OF THE STATE OF NEVADA

RALPH EDMOND GOAD,  
Appellant,

No. 79977 Electronically Filed  
Mar 26 2020 12:02 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

vs.

THE STATE OF NEVADA,  
Respondent.

\_\_\_\_\_ /

MOTION FOR EXTENSION OF TIME TO FILE THE OPENING BRIEF  
AND JOINT APPENDIX

Appellant, by counsel, hereby moves for an extension of time of 30 days to and including May 8, 2020, within which to file Appellant's Opening Brief and Joint Appendix. The reasons for this request are set forth in the attached declaration.

DATED this 26th day of March 2020.

JOHN L. ARRASCADA  
Washoe County Public Defender

By: KATHRYN REYNOLDS, Deputy  
Nevada State Bar Number 10955  
350 South Center Street, 5th Floor  
Reno, Nevada 89501  
(775) 337-4882  
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## DECLARATION OF COUNSEL

I declare under penalty of perjury that the following is true and correct:

1. I am a Deputy in the Washoe County Public Defender's Office; I am an appellate attorney for Washoe County Public Defender's Office; and I am Appellant's counsel in this direct appeal.

2. Appellant's Opening Brief and Joint Appendix in this appeal are due on April 8, 2020. I have previously received extensions of time to file the opening brief and appendices, but I am requesting an additional 30-day extension of time from April 8, 2020 to May 8, 2020, in which to file the opening brief and joint appendix.

3. This request for additional time is necessary because due to extenuating circumstances, the transcripts for several days of trial were not received in this case until March 26, 2020. I have received assurances that the final day of transcription will be delivered by March 30, 2020.

4. I am currently working on other appellate cases that are at various stages in the appellate process. I believe that I have been diligently moving my appellate caseload.

5. I am working on other non-appellate cases within the Washoe County Public Defender's Office as assigned.

6. Respondent does not oppose this motion for an extension of time.

7. This motion for an extension of time is made in good faith and not solely for the purpose of delay.

/s/ Kathryn Reynolds  
KATHRYN REYNOLDS

## **CERTIFICATE OF SERVICE**

I hereby certify that this document was filed electronically with the Nevada Supreme Court on the 26th day of March, 2020. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Jennifer P. Noble, Chief Appellate Deputy  
Washoe County District Attorney's Office

I further certify that I served a copy of this document by mailing a true and correct copy thereof to:

RALPH EDMOND GOAD (#1223816)  
Northern Nevada Correctional Center  
PO Box 7000  
Carson City, Nevada 89702

/s/ Kathryn Reynolds  
Washoe County Public Defender's Office