

ARMANDO VASQUEZ-REYES,)
)
Appellant,)
)
vs.)
)
THE STATE OF NEVADA,)
)
Respondent.)
_____)

Electronically Filed
May 27 2020 12:31 p.m.
Elizabeth A. Brown
Clerk of Supreme Court
Case No. 80293

Comes Now Appellant ARMANDO VASQUEZ-REYES, by and through Deputy Public Defender AUDREY M. CONWAY, and moves for a sixty-day extension of time within which to file the Opening Brief in this case. This Motion is based upon the attached Declaration of counsel.

PHILIP J. KOHN
CLARK COUNTY PUBLIC DEFENDER

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DECLARATION OF AUDREY M. CONWAY

1. I am an attorney licensed to practice law in the State of Nevada; I am a deputy public defender assigned to handle the appeal of this matter; I am familiar with the procedural history of this case.

2. Our office filed the Notice of Appeal in this matter on December 31, 2019. After granting a 30-day stipulation to extend the deadline for the filing of the Opening Brief, this Court ordered the Opening Brief to be filed by May 29, 2020.

3. Due to several unforeseen medical issues requiring numerous doctor's appointments, I have been unable to complete the research and writing of the Opening Brief, and I am respectfully requesting a sixty-day extension of time to complete my review of the record and to prepare and file the instant Opening Brief.

4. In addition to time away from the office as a result of medical issues, due to reduced courthouse hours and staffing as a result of the ongoing pandemic, I have encountered delays in obtaining copies of the court and trial exhibits relevant to several appellate issues in this case.

5. This case involves multiple convictions for sexual assault and lewdness with a minor, and an aggregate sentence of 45 years to life in prison with lifetime supervision. The trial lasted for eight days, and the

appellate appendix consists of 2,192 pages. The client and I communicate through a Spanish interpreter, which has resulted in additional delays in the preparation of the Opening Brief, and the client has requested additional time for further communications regarding the appellate issues in this case.

6. My client understands and supports the need for additional time to ensure that all issues are thoroughly researched and briefed. This request for extension of time is made in good faith and not for the purposes of delay. It is the best professional judgment of the undersigned that this extension is crucial to the perfection of this appeal and to the provision of effective assistance of counsel to this client.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on the 27th day of May, 2020.

/s/ Audrey M. Conway
AUDREY M. CONWAY

CERTIFICATE OF SERVICE

I hereby certify that this document was filed electronically with the Nevada Supreme Court on the 27 day of May, 2020. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

AARON D. FORD
ALEXANDER CHEN

AUDREY M. CONWAY
HOWARD S. BROOKS

I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage pre-paid, addressed to:

ARMANDO VASQUEZ-REYES
NDOC No: 1227206
c/o High Desert State Prison
P.O. Box 650
Indian Springs, NV 89070

BY /s/ Carrie M. Connolly
Employee, Clark County Public
Defender's Office