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Elizabeth A. Brown
Clerk of Supreme Court

IN THE SUPREME COURT OF THE STATE OF NEVADA

6 JAIDEN CARUSO,)
7 Appellant,) Case No. 80361
8 vs.)
9 THE STATE OF NEVADA,)
10 Respondent.)
11 _____)

12 **MOTION FOR AN EXTENSION OF TIME TO FILE OPENING BRIEF (SECOND)**

13 COMES NOW Appellant Jaiden Caruso, by and through his undersigned counsel Mace J.
14 Yampolsky, Esq., and hereby moves the Court pursuant to NRAP 31(b)(3) for a second extension of time
15 to file and serve his Opening Brief and Appendix.

16 In the instant matter, a jury trial was held, and on August 17, 2019 the jury found the Appellant
17 guilty of 1st Degree Murder with Use of a Deadly Weapon, and Guilty of Robbery with Use of a Deadly
18 Weapon. On December 10, 2019, the Appellant was sentenced on Count 1 to life in prison with a minimum
19 parole eligibility of 20 years, plus a consecutive term of 48 to 120 months for the deadly weapon
20 enhancement, and on Count 2, 48 months to 120 months; plus a consecutive term of 48 months to 120
21 months for the deadly weapon enhancement; concurrent to Count 1. The Judgment of Conviction was
22 entered on December 12, 2019, and this appeal followed.

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1 Currently, Appellant's Opening Brief and Appendix are due June 8, 2020, and this is the second
2 request for an extension of time. While counsel has been diligently working on Appellant's brief, counsel
3 has discovered a constitutional argument which is requiring extensive research, and reworking of the brief.
4 Counsel has an obligation to his client to make all arguments on his behalf as he is facing a sentence of life
5 in prison. Therefore, counsel is in need of an additional extension of time of thirty days, i.e., up through
6 and including July 8, 2020, to file the Opening Brief and Appendix. It is not anticipated that any further
7 extensions will be necessary.

8 DATED this 26th day of May, 2020.

9 YAMPOLSKY & MARGOLIS

10
11 /s/ Mace J. Yampolsky, Esq.
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16 Attorney for Appellant
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Alexander Chen
Aaron Ford

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