

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

SAMUEL HOWARD,

Appellant,

v.

WILLIAM GITTERE, Warden,  
AARON D. FORD, Attorney General  
for the State of Nevada, and THE  
STATE OF NEVADA,

Respondents.

Supreme Court Case Nos. 81278,  
81279

Electronically Filed  
Sep 03 2020 10:49 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

Underlying Case:  
Clark County Dist. Ct.  
Nos. 81C053867, A-18-780434-W

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

For the reasons set forth in the following memorandum, Appellant Samuel Howard asks this Court for an enlargement of time within which to file his Reply Brief. This motion is made in good faith and not for the purposes of delay.

DATED this 3rd day of September 2020.

HENDRON LAW GROUP LLC

*/s/ Lance J. Hendron*

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*/s/ Deborah A. Czuba*

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### MEMORANDUM

I, DEBORAH A. CZUBA, am a duly licensed attorney in the State of Idaho and am employed by the Federal Defender Services of Idaho, Inc., where I am Supervising Attorney of the Capital Habeas Unit.

This Court may extend the time to file a Reply Brief in a post-conviction capital appeal upon a clear showing of good cause. SCR 250(7)(d), NRAP 31(b)(3)(d).

Mr. Howard's Reply Brief is currently due on September 24, 2020. This is Mr. Howard's first request for an enlargement of time, and he respectfully requests and extension of 30 days, making the reply due on October 26th.

Ms. Czuba is a solo parent and has faced significant obstacles with the virtual nature of her elementary age child's return to school including the added burden of the school district's recommended four hours of parental supervision of the educational process. Counsel's supervisory duties have increased

exponentially with regard to maintaining contact with her staff and coordinating teleworking and COVID-19 policies within the office. In addition, Mr. Horwitz is on paternity leave and will not return to the office until September 29, 2020. The additional time in this matter will allow counsel to thoroughly address the Appellant's arguments in this matter.

Ms. Czuba spoke with Respondents' counsel on September 3, 2020 and he does not oppose this request.

DATED this 3rd day of September 2020.

HENDRON LAW GROUP LLC

/s/ Lance J. Hendron

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## CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document on September 3, 2020. Electronic service of the document shall be made in accordance with the Master Service List to:

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/s/ L. Hollis Ruggieri  
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