

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

MICHAEL PHILLIP ANSELMO,

Appellant,

vs.

STATE OF NEVADA,

Respondent.

**Supreme Court No. 81382**

Second Judicial District Court

Case No. 271359

Electronically Filed  
Mar 04 2021 04:52 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

---

**UNOPPOSED MOTION TO EXTEND DEADLINE FOR APPELLANT TO  
FILE AND SERVE REPLY BRIEF FROM MARCH 8, 2021 TO MARCH 29,  
2021**

---

Sydney R. Gambee, Esq.  
Nevada Bar No. 14201  
Jessica E. Whelan, Esq.  
Nevada Bar No. 14781  
HOLLAND & HART LLP  
9555 Hillwood Drive, Second Floor  
Las Vegas, Nevada 89134  
Tel: (702) 669-4600

Jennifer Springer  
Nevada Bar No. 13767  
Rocky Mountain Innocence Center  
358 South 700 East, B235  
Salt Lake City, UT 84102

*Attorneys for Appellant Michael Phillip Anselmo*

Michael Phillip Anselmo (“Appellant”) by and through his undersigned counsel of record, hereby moves the Court pursuant to NRAP 31(b)(3) (and this Court’s February 3, 2021 Notice Motion/Stipulation Approved) to extend the deadline for Appellant to file his Reply Brief by three weeks, from March 8, 2021 until March 29, 2021.

This is the second request to continue the subject Reply Brief deadline. On February 3, 2021, Appellant filed a Stipulation for Extension of Time for the subject Reply Brief, which extension from February 5, 2021 to March 8, 2021 was granted. According to the Court’s February 3, 2021 Notice of Motion/Stipulation Approved, any request for additional extension of time shall be made upon motion clearly demonstrating good cause.

The three-week extension of the Reply Brief requested herein is supported by good cause as follows. One of counsel for Appellant recently received a positive test result for COVID-19. Due to the resulting quarantine, childcare, and other logistical issues resulting from the positive result, a short, three-week extension of the current Reply Brief deadline of March 8, 2021 to March 29, 2021 is requested to ensure that this matter may be fully and fairly briefed.

On March 3 and 4, 2021, counsel for Appellant contacted counsel for Respondent to ascertain whether counsel objects to the extension requested herein.

On March 4,2021, counsel for Respondent confirmed that she does not oppose the extension of three weeks requested herein.

This motion is made in good faith and not for the purpose of delay.

DATED this 4th day of March 2021.

/s/ Sydney R. Gambee

Sydney R. Gambee, Esq.

Nevada Bar No. 14201

Jessica E. Whelan, Esq.

Nevada Bar No. 14781

HOLLAND & HART LLP

9555 Hillwood Drive, 2nd Floor

Las Vegas, Nevada 89134

Jennifer Springer

Nevada Bar No. 13767

Rocky Mountain Innocence Center

358 South 700 East, B235

Salt Lake City, UT 84102

*Attorneys for Appellant Michael Anselmo*

## **CERTIFICATE OF SERVICE**

Pursuant to NRAP 25(a)(b) and 25(1)(d), I, the undersigned, hereby certify that I electronically filed the foregoing **UNOPPOSED MOTION TO EXTEND DEADLINE FOR APPELLANT TO FILE AND SERVE REPLY BRIEF FROM MARCH 8, 2021 TO MARCH 29, 2021** with the Clerk of Court for the Supreme Court of Nevada by using the Supreme Court of Nevada's E-filing system on the 4th day of March 2021.

I further certify that service of the foregoing has been accomplished to the following individuals by the methods indicated below:

- ☒ Electronic: by submitting electronically for filing and/or service with the Nevada Supreme Court's e-filing system and served on counsel electronically in accordance with the E-service list to the following listed below:

Division of Probation & Parole  
Jennifer Noble, Esq.  
Marilee Cate, Esq.  
Appellate Division  
Washoe County District Attorney  
1 S. Sierra Street, South Tower, 4th  
Floor  
Reno, NV 89501

Keith G. Munro, Esq.  
Washoe County District  
Attorney's Office  
1 S. Sierra Street, South  
Tower, 4th Floor  
Reno, NV 89501

Aaron Ford, NV Attorney General  
Office of the Attorney General  
State of Nevada  
100 N. Carson Street  
Carson City, NV 89701

- ☒ U.S. Mail: a true copy was placed in Holland & Hart LLP's outgoing mail in a sealed envelope addressed to the following:

Michael P. Anselmo  
475 Cemetery Road  
Trailer 60  
Reno, NV 89503

/s/ Valerie Larsen

An employee of Holland & Hart LLP