

IN THE SUPREME COURT OF THE STATE OF NEVADA

Kevin Sunseri,
Appellant

vs.

The State of Nevada,
Respondent,

) Supreme Court Case No.: 81551
)
) Electronically Filed
) **APPELLANT'S MOTION FOR** 2020 11:21 a.m.
) **EXTENSION OF TIME TO** Elizabeth A. Brown
) **TRANSCRIPT REQUEST** Clerk of Supreme Court

) **Extension Requested: 30 days**
)
)
)

COMES NOW, KELSEY BERNSTEIN, ESQ., Retained Counsel, hereby moves this Court for an extension of time within which to file the Transcript Request. This Motion is based on the following memorandum, declaration of counsel and all pleadings and papers on file herein.

DATED this 30 day of August, 2020.

NEVADA DEFENSE GROUP

By: Kelsey Bernstein
Kelsey Bernstein, Esq.
Nevada Bar No.: 13825
Nevada Defense Group
714 S. Fourth Street
Las Vegas, NV 89101
Attorney for Appellant

MEMORANDUM/DECLARATION

Counsel, Kelsey Bernstein, is a duly licensed attorney in the State of Nevada and has been retained to represent Appellant Kevin Sunseri in the instant appeal.

Appellant's Transcript Request is due on September 8, 2020.

Counsel has filed a Motion for Leave to Proceed in Forma Pauperis in the Eighth Judicial District Court to request financial assistance with the production of transcripts; the Motion is currently pending.

This is the first written request for an extension of time filed by Appellant in this matter.

No parties in this appeal will suffer prejudice or harm as a result of the requested extension.

I declare under penalty of perjury that the information set forth in this Memorandum is true and correct.

DATED this 30 day of August, 2020.

NEVADA DEFENSE GROUP

By: Kelsey Bernstein
Kelsey Bernstein, Esq.
Nevada Bar No.: 13825
Nevada Defense Group

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 30 day of August, 2020, I faxed and/or mailed a true and correct copy of the foregoing **MOTION FOR EXTENSION OF TIME**, to the following:

Alex Chen, Esq.
Clark County District Attorney's Office
200 Lewis Avenue
Las Vegas, Nevada 89101



Kelsey Bernstein