

IN THE SUPREME COURT OF THE STATE OF NEVADA

THE STATE OF NEVADA,)	
)	
Appellant,)	
)	
vs.)	
)	
VINNIE ADAMS,)	
)	
Respondent.)	
)	

Electronically Filed
Jun 01 2021 04:07 p.m.
Elizabeth A. Brown
Clerk of Supreme Court
Case No. 81782

RESPONDENT’S MOTION FOR EXTENSION OF TIME

Comes Now Respondent, Vinnie Adams, by and through Deputy Public Defender Christopher T. Howell, and moves for an extension of time of ninety-two (92) days from Wednesday, June 2, 2021 through and including Wednesday, September 1, 2021 to file the Respondent’s Answering Brief in this case. The grounds for this request are described in the attached Declaration.

DATED this 1st day of June, 2021.

DARIN F. IMLAY
CLARK COUNTY PUBLIC DEFENDER

By /s/ Christopher T. Howell
CHRISTOPHER T. HOWELL, #13504
Deputy Public Defender

DECLARATION OF CHRISTOPHER T. HOWELL

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. The State of Nevada filed the Notice of Appeal on September 14, 2020. On January 12, 2021, the State of Nevada filed a motion to extend time to file the Opening Brief. The motion was granted January 15, 2021. A second motion to extend was filed March 12, 2021. An order denying the motion making the brief due April 1, 2021 was filed March 19, 2021.

3. On April 1, 2021, the State filed the Opening Brief.

4. Declarant has reviewed the entirety of the Opening Brief and has outlined his response.

5. Declarant is on the specialty sex team in the Clark County Public Defender's office and the team has been without a legal secretary since January, 2021. The team itself is down two members. These shortages have caused a larger amount of additional preparation of motions, pleadings, etc., that would normally be completed by support staff.

6. Declarant has an upcoming vacation out of the state of Nevada which was preplanned.

7. On August 1 through 14, 2021, Declarant will be attending The National Criminal Defense College. Declarant will be working during his available time to complete the Answering Brief.

8. I am asking for an extension of ninety-two (92) days within which to complete and file the Respondent's Answering Brief.

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

EXECUTED on the 1st day of June, 2021.

/s/ Christopher T. Howell
CHRISTOPHER T. HOWELL

CERTIFICATE OF SERVICE

I hereby certify that this document was filed electronically with the Nevada Supreme Court on the 1st day of June, 2021. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

AARON D. FORD
ALEXANDER CHEN

CHRISTOPHER T. HOWELL

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

VINNIE ADAMS
c/o Clark County Public Defender
330 South Third Street, 5th Floor
Las Vegas, NV 89101

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