

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

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|----------------------|---|------------------------|
| THE STATE OF NEVADA, | ) | Electronically Filed   |
|                      | ) | Aug 31 2021 01:29 p.m. |
| Appellant,           | ) | Elizabeth A. Brown     |
|                      | ) | Clerk of Supreme Court |
| vs.                  | ) | Case No. 81782         |
|                      | ) |                        |
| VINNIE ADAMS,        | ) |                        |
|                      | ) |                        |
| Respondent.          | ) |                        |
|                      | ) |                        |

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**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 fifty (50) days from Wednesday, September 1, 2021, through and including Thursday, October 21, 2021, to file the Respondent’s Answering Brief in this case. The grounds for this request are described in the attached Declaration.

DATED this 31<sup>st</sup> day of August, 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. On August 1 through 14, 2021, Declarant attended The National Criminal Defense College. This was a very busy time and most of

Declarant's caseload had to be continued and/or pushed out to allow for his time out of the State.

7. Upon Declarant's return from The National Criminal Defense College, Declarant has been working to clear the back up of cases that were continued during my time away. I have also been working on the Answering Brief in an attempt to finalize for said filing.

8. Appellate staff will be out of town for a preplanned function during a portion of September and October. She is the only support staff that is able to finalize the Answering brief for filing.

9. I am asking for an extension of fifty (50) days within which to complete and file the Respondent's Answering Brief. This extension will allow Declarant ample time to make any edits, work on page/type limitations and then allow time for appellate staff to mark and finalize for filing.

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

EXECUTED on the 31<sup>st</sup> day of August, 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 31<sup>st</sup> day of August, 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, 5<sup>th</sup> Floor  
Las Vegas, NV 89101

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