

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

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**LARRY DECORLEON BROWN**

Appellant,

vs.

**THE STATE OF NEVADA**

Respondent.

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**Docket No. 81962**

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Direct Appeal From A Judgment of Conviction  
Eighth Judicial District Court  
The Honorable Valerie Adair, District Judge  
District Court No. C-17-326247-1

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**MOTION FOR EXTENSION OF TIME TO FILE  
OPENING BRIEF (SECOND REQUEST)**

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Navid Afshar  
State Bar #14465  
Deputy Special Public Defender  
JoNell Thomas  
State Bar #4771  
Special Public Defender  
330 South 3<sup>rd</sup> Street  
Las Vegas, NV 89155  
(702) 455-6265  
Attorney for Brown

COMES NOW, Appellant Larry Brown, by and through his attorney, Navid Afshar, Deputy Special Public Defender, and requests this Honorable Court to grant an extension of time of 21 days to file the opening brief and appendix in this matter, up to and including July 9, 2021. This is Appellant's second request for an extension of time.

### STATEMENT OF THE CASE

This is an appeal from a judgment of conviction of Conspiracy to Commit Robbery, Robbery with Use of a Deadly Weapon, and First-Degree Murder with Use of a Deadly Weapon.

Pursuant to this Court's Order dated June 4, 2021, the briefing schedule was reset, and the Opening Brief and Appendix are due June 18, 2021.

### POINTS AND AUTHORITIES

NRAP 31(b)(3)(B) sets forth in pertinent part:

A motion for extension of time for filing a brief may be made no later than the due date for the brief.....

(B) ...The court will grant an initial motion for extension of time for filing a brief only upon a clear showing of good cause. The court shall not grant additional extensions of time except upon a showing of extraordinary circumstances and extreme need.....

## CONCLUSION

Based on the Declaration attached hereto, Mr. Brown requests the Court grant his motion for an extension of time of 21 days, to file the Opening Brief and Appendix, up to and including July 9, 2021.

DATED this 17<sup>h</sup> day of June, 2021.

SUBMITTED BY:

/s/ NAVID AFSHAR

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NAVID AFSHAR  
Deputy Special Public Defender  
330 S. Third St., Ste. 800  
Las Vegas, Nevada 89155  
702-455-6265  
Attorney for Appellant Brown

## DECLARATION OF NAVID AFSHAR

NAVID AFSHAR, hereby declares as follows:

1. That I am an attorney duly licensed to practice law in the State of Nevada, and the deputy with the Clark County Special Public Defender's office assigned to represent Mr. Brown on his direct appeal from a Judgment of Conviction (Verdict From Jury Trial).

2. I was not the trial attorney in this case.

3. A previous request for an extension of time was granted. In addition, this Court issued an Order which reset the briefing scheduling in the instant matter; and Mr. Brown's Opening Brief is due June 18, 2021.

4. I have been working diligently on my review of the record and draft of the brief, but I have been unable to complete the brief due to a number of factors:

5. I am close to completion of the brief but was out the last week due to a medical issue.

6. The record in this case is voluminous and because the district court did not record any of the bench conferences, it has taken longer to ascertain the record for many of the issues.

7. There have been issues with certain documents in the record that Appellant just recently was able to correct.

8. Appellant does not anticipate any further extensions.

I respectfully request an extension of 21 days, up to and including July 9, 2021, to file Appellant's Opening Brief and Appendix.

I declare that I make this request in good faith and not for purposes of delay.

Dated: June 17, 2021

/s/ NAVID AFSHAR

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NAVID AFSHAR  
Attorney for Brown

### **CERTIFICATE OF SERVICE**

The undersigned does hereby certify that on 6/17/2021, a copy of the foregoing MOTION was served as follows:

#### **BY ELECTRONIC FILING TO**

District Attorney's Office  
200 Lewis Ave., 3<sup>rd</sup> Floor  
Las Vegas, NV 89155

Nevada Attorney General  
100 N. Carson St.  
Carson City NV 89701

/s/ NAVID AFSHAR

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NAVID AFSHAR