

IN THE SUPREME COURT OF THE STATE OF NEVADA

STATE OF NEVADA ex rel. its
DEPARTMENT OF
CORRECTIONS,

Appellant,

vs.

JOSE MIGUEL NAVARRETE, an
individual,

Respondent.

Supreme Court Case No.: 82113

District Court Case No. A-19-07661 J
Electronically Filed
Mar 19 2021 11:15 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

**STIPULATION TO EXTEND
BRIEFING**

Appellant, STATE OF NEVADA EX REL. ITS DEPARTMENT OF CORRECTIONS, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Michelle Di Silvestro Alanis, Supervising Senior Deputy Attorney General and Respondent, JOSE MIGUEL NAVARRETE, by and through counsel, Daniel Marks, of the Law Office of Daniel Marks, hereby stipulate and agree, pursuant to NRAP 26(b)(2) and 31(b)(2) that Appellant shall have a 45 (forty-five) day extension of time from the filing of the Eighth Judicial District Court's transcript in which to file its Opening Brief. Appellant's Opening Brief is currently due March 25, 2021; however, the transcript has not been filed.

Good cause exists for the extension of time as the transcript from the proceedings in the District Court have not been filed with the Nevada Supreme Court. Miscommunications between the Appellant and the Court Reporter have delayed the District Court from filing its transcript that was requested December 8, 2020. The matter has been resolved and Appellant expects the transcript to be filed within the next two to three weeks. Additionally, counsel for Appellant

requires additional time due to counsel's current workload and continued circumstances and challenges from the coronavirus pandemic.

Appellant has not sought any previous extensions of time to file its Opening Brief. Thus, no requests for extension of time have been denied.

This stipulation is made in good faith and not for the purposes of delay.

DATED this 19 day of March, 2021.

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AARON D. FORD
ATTORNEY GENERAL

LAW OFFICES OF DANIEL MARKS

By: /s/ Michelle Di Silvestro Alanis
Michelle Di Silvestro Alanis (Bar No. 10024)
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