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IN THE SUPREME COURT OF THE STATE OF NEVADA

* * * * *

CLEMON HUDSON

Appellant,

vs.

THE STATE OF NEVADA,

Respondent.

S.C. CASE NO. 82231
Electronically Filed
Apr 16 2021 07:55 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

MOTION FOR EXTENSION OF TIME TO FILE OPENING BRIEF

COMES NOW, Christopher R. Oram, Esq., attorney for Appellant, CLEMON HUDSON, and moves this Court for an Order granting an extension of time of ninety (90) days from the date the Opening Brief is now due, to wit: April 16, 2021, and extend the time to and including July 15, 2021, for the filing of the Opening Brief and Appendix. This motion is made and based upon NRAP 27 and 31(a), the Affidavit of Christopher R. Oram, Esq., filed herewith, and the Points and Authorities attached hereto.

DATED this 16th day of April, 2021.

Respectfully submitted by:

/s/ Christopher R. Oram, Esq.
CHRISTOPHER R. ORAM, ESQ.
Nevada Bar No. 004349
520 S. Fourth Street, 2nd Floor
Las Vegas, Nevada 89101
(702) 384-5563

Attorney for Appellant
CLEMON HUDSON

CHRISTOPHER R. ORAM, LTD.
520 SOUTH 4TH STREET | SECOND FLOOR
LAS VEGAS, NEVADA 89101
TEL. 702.384-5563 | FAX. 702.974-0623

1 **POINTS AND AUTHORITIES**

2 Time for Serving and Filing Briefs.

3 The appellant shall serve and file the OPENING brief
4 within one hundred and twenty (120) days after the date
5 on which the appeal is docketed in the Supreme Court.
6 The respondent shall serve and file his answering brief
7 within thirty (30) days after service of the brief of the
8 appellant. After service of respondent's brief, any
9 OPENING brief must be served and filed within thirty
10 (30) days. . . . By written stipulation timely filed with
11 the Supreme Court, the parties may extend the time for
12 filing any brief for a total of thirty (30) additional days
13 unless the court otherwise orders. Applications for
14 extensions of time beyond that to which the parties are
15 permitted to stipulate are not favored, and will be
16 considered only on motion for good cause clearly
17 shown, or ex parte in cases of extreme and
18 unforeseeable emergency. The Supreme Court may
19 shorten the periods prescribed above for serving and
20 filing briefs, either by rule for all cases or for classes of
21 cases, or by order for specific cases."

22 Mr. Hudson's Opening Brief and Appendix is currently due on April 16,
23 2021. This is the first request for an extension of time. The instant case involves
24 both an appeal from a denial of post-conviction issues as well as a direct appeal
25 which was granted as a result of the post-conviction proceedings. Given this, the
26 complexity of the Opening Brief necessitates counsel be given additional time to
27 devote to this case.

28 Counsel has been working diligently and has completed the appendix in
this case which spans twelve volumes and nearly 1,800 pages. However,
additional time is needed to draft the opening brief on these complex, and
numerous issues spanning from the trial in both the direct appeal and post-
conviction context.

Moreover, additional time is needed to consult with Mr. Hudson on this
issue as communication from within the prison during the preceding months has
been difficult due to the COVID-19 pandemic and associated lockdowns within
the facilities.

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Therefore, counsel respectfully request that this Court permit him an additional ninety (90) days in order to file the Opening Brief and Appendix.

DATED this 16th day of April, 2021.

Respectfully submitted by:

/s/ Christopher R. Oram, Esq.
CHRISTOPHER R. ORAM, ESQ.
Nevada Bar #004349
520 S. Fourth Street, 2nd Floor
Las Vegas, Nevada, 89101

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TEL. 702.384-5563 | FAX. 702.974-0623

AFFIDAVIT OF CHRISTOPHER R. ORAM
IN SUPPORT OF MOTION FOR EXTENSION OF TIME
TO FILE OPENING BRIEF

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

CHRISTOPHER R. ORAM, ESQ., being duly sworn, deposes and states:

1. I am an attorney duly licensed to practice law in the State of Nevada. I am counsel for the Appellant in the above-entitled matter. I have personal knowledge of all matters contained herein and am competent to testify thereto.

2. Mr. Hudson’s Opening Brief and Appendix is currently due on April 16, 2021. This is the first request for an extension of time. The instant case involves both an appeal from a denial of post-conviction issues as well as a direct appeal which was granted as a result of the post-conviction proceedings. Given this, the complexity of the Opening Brief necessitates counsel be given additional time to devote to this case.

Counsel has been working diligently and has completed the appendix in this case which spans twelve volumes and nearly 1,800 pages. However, additional time is needed to draft the opening brief on these complex, and numerous issues spanning from the trial in both the direct appeal and post-conviction context.

Moreover, additional time is needed to consult with Mr. Hudson on this issue as communication from within the prison during the preceding months has been difficult due to the COVID-19 pandemic and associated lockdowns within the facilities.

Therefore, counsel respectfully request that this Court permit him an additional ninety (90) days in order to file the Opening Brief and Appendix.

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3. That this motion is made in good faith and not for purposes of delay.
FURTHER YOUR AFFIANT SAYETH NAUGHT.

DATED this 16th day of April, 2021.

/s/ Christopher R. Oram, Esq.
CHRISTOPHER R. ORAM, ESQ.

SWORN and SUBSCRIBED before me
this 16th day of April, 2021.

/s/ Nancy Medina
NOTARY PUBLIC in and for
said County and State

1 **CERTIFICATE OF SERVICE**

2 I hereby certify and affirm that this document was filed electronically with
3 the Nevada Supreme Court on April 16, 2021. Electronic Service of the foregoing
4 document shall be made in accordance with the Master Service List as follows:

5 AARON FORD
6 Nevada Attorney General

7 CLARK COUNTY DISTRICT ATTORNEY’S OFFICE
8 CHRISTOPHER R. ORAM, ESQ.

9
10 BY:

11
12 /s/ Nancy Medina
13 An Employee of Christopher R. Oram, Esq.

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