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Electronically Filed
Jun 07 2021 12:13 p.m.
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Clerk of Supreme Court

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6 Attorney for ANDRE GRANT SNIPES

7 **DISTRICT COURT**

8 **CLARK COUNTY, NEVADA**

9
10 STATE OF NEVADA,
11 Plaintiff,
12 v.
13 ANDRE GRANT SNIPES,
14 Defendant.

DISTRICT COURT NO.: - C-19-344461-2
GRAND JURY NO.: - 18CGJ163B
SUPREME COURT NO.: - 82384

**APPELLANT'S MOTION FOR ENLARGEMENT OF
TIME TO FILE OPENING BRIEF
(SECOND REQUEST)**

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18 ANDRE GRANT SNIPES hereby moves for an enlargement of time
19 to file his opening brief - to June 30, 2021.

20 **A. DISTRICT COURT PROCEDURAL BACKGROUND**

21 SNIPES was convicted on November 13, 2020 of robbery and
22 burglary of various shoe stores. He was sentenced to 5-13 years.

23 The opening brief in this case was due on May 25, 2021. A
24 telephonic enlargement of time was granted on May 24, 2021, so
25 that the new deadline for filing the opening brief in this case
26 is June 9, 2021. An enlargement of three weeks is currently
27 requested to June 30, 2021.

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1 **B. JUSTIFICATION FOR MOTION**

2 No prior enlargement of time was requested for the opening
3 brief.

4 **Appendix**

5 Counsel did not receive all transcripts until the end of
6 March, 2021, after filing a motion on March 18, 2021 with this
7 Court, requesting an order to produce transcripts. With a May
8 25, 2021 deadline for filing the Opening Brief, this late filing
9 of the transcripts which had been requested in January,
10 compressed the time within which counsel had to prepare the
11 Opening Brief by about thirty days. Counsel requested a two-
12 week enlargement telephonically, but unfortunately, she was not
13 able to meet this deadline
14

15 **Covid Issues**

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17 After being locked down for over a year, counsel jumped at
18 the chance to see friends and family, and spent a week visiting
19 with her son who flew in for Mother's Day. She spent another
20 week with friends who visited over Memorial Day. This put her
21 behind two weeks in her work.
22

23 **C. CONCLUSION**

24 Counsel begs the court's indulgence in granting this
25 enlargement of time. This is a short three-week request, which
26 is justified by the late filing of transcripts in and of itself.

27 Counsel has assembled and bound all copies of the Appendix
28 and provided a copy of the Appendix to client for his review.

1 She has only to read the record and prepare the Opening Brief,
2 which she believes she will be able to do in the three-week time
3 period requested.

4 Accordingly, Counsel respectfully requests a three-week
5 enlargement of time to June 30, 2021 to file the Opening Brief
6 and Appendix.

7 Dated this 7th day of June, 2021.



8 SANDRA L. STEWART, ESQ.
9 Nevada Bar No.: 6834
10 Attorney for Appellant, SNIPES
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CERTIFICATE OF SERVICE

I hereby certify that on JUNE 7, 2021, I served a copy of the:


**APPELLANT'S MOTION FOR ENLARGEMENT OF TIME TO FILE OPENING BRIEF
(SECOND REQUEST)**

by mailing a copy via first class mail, postage thereon fully prepaid, to the following:

ANDRE GRANT SNIPES, Inm. No. 1240651
HIGH DESERT STATE PRISON
POST OFFICE BOX 650
INDIAN SPRINGS, NV 89070

and by e-filing the document with the Nevada Supreme Court, thereby providing access to a copy to all other interested parties, including but not limited to, the following:

STEVEN B. WOLFSON, ESQ.
CLARK COUNTY DISTRICT ATTORNEY
200 LEWIS AVENUE
LAS VEGAS, NV 89155-2212



SANDRA L. STEWART