

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

ANTHONY ROY SALAZAR,  
Appellant.

Electronically Filed  
Nov 19 2021 01:52 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

SUPREME COURT CASE NO:  
82667

DISTRICT COURT CASE NO.:  
D611509

**MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S  
OPENING BRIEF AND APPENDIX  
(First Request)**

Appellant ANTHONY ROY SALAZAR hereby respectfully moves this Honorable Court for thirty (30) days, until February 2, 2022, to file Appellant's Opening Brief and Appendix, which is currently due on January 3, 2022. This is the first request for an extension in this matter. This motion is based on the following memorandum and all papers and pleadings on file herein.

**MEMORANDUM**

This Court may "[f]or good cause" extend the time "prescribed by the [Nev. R. App. P.] or by its order to perform any act, or may permit an act to be done after that time expires." NRAP 26(b)(1)(A). Here, there is "good cause" to extend the time for filing Appellant's Opening Brief.

This case is part of the Partners in Pro Bono program, in which students from UNLV's William S. Boyd School of Law collaborate with practicing attorneys on pro bono cases. This program allows law students to work on a real case under the guidance of experienced attorneys and put their classroom skills to the test while improving access to justice for Nevadans who cannot afford counsel. Law students are expected to "participate in all aspects of the case."<sup>1</sup>

The current January 3, 2022, deadline interferes with the assigned law student's unavoidable end-of-semester academic obligations and would make it impossible for her to effectively participate. The Fall 2021 semester at UNLV's Boyd School of Law concludes on November 24., 2021.<sup>2</sup> The exam preparation period begins the next day.<sup>3</sup> Final exams run from November 30, 2021, through December 13, 2021.<sup>4</sup> Attempting to adequately prepare for two final exams and a final project while juggling winter break commitments would undoubtedly impede the law student's ability to assist with drafting the brief to the Nevada Supreme

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<sup>1</sup> *Hands-On Experience*, William S. Boyd School of Law, (last visited Nov. 18, 2021), <https://law.unlv.edu/academics/jd-program/hands-on-experience>

<sup>2</sup> *Fall '21 Academic Calendar.pdf*, William S. Boyd School of Law, (last visited Nov. 18, 2021), <https://bsl.app.box.com/s/u1euu021waeh132dg4q7z2srncdjpp18>

<sup>3</sup> *Id.*

<sup>4</sup> *Id.*

Court. Supervising counsel also have their own holiday obligations, further limiting the team's availability to work with the law student and revise the draft within the given time frame.

Further, the issues would benefit from additional research given the potential public policy import.

Given the aforementioned conflicts, there is good cause to justify an extension of the filing deadline to ensure the issues in this case can be sufficiently researched and addressed. This Motion is made in good faith and not for purposes of delay.

This Motion is not made for the purposes of delay, or any other improper purpose, but only to ensure that I provide competent and effective representation to the Review-Journal. *See Nev. R. Prof. Conduct 1.1.*

Appellant ANTHONY ROY SALAZAR therefore respectfully requests an extension of thirty (30) days for the Opening Brief and Appendix, which would move that deadline from January 3, 2022, to February 2, 2022.

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The undersigned declares under penalty of perjury the factual representations set forth in the foregoing memorandum are true and correct.

DATED this the 19<sup>th</sup> day of November, 2021.

*/s/ Margaret A. McLetchie*

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Margaret A. McLetchie, Nevada Bar No. 10931

Dayvid J. Figler, Nevada Bar No. 4264

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*Counsel for Appellant, SALAZAR in conjunction with the  
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## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing MOTION FOR EXTENSION OF TIME TO FILE APPELLANT’S OPENING BRIEF AND APPENDIX (First Request) was filed electronically with the Nevada Supreme Court on the 19<sup>th</sup> day of November, 2021. Electronic service of the foregoing document shall be made in accordance with the Master Service List as follows (and/or by United States First-Class Mail postage fully prepaid):

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