

IN THE SUPREME COURT OF THE STATE OF NEVADA

Electronically Filed
Nov 05 2021 02:18 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

RAUL GARCIA

Appellant,

v.

THE STATE OF NEVADA,

Respondent.

Case No. 83021

**MOTION FOR EXTENSION OF TIME IN WHICH TO FILE
OPENING BRIEF AND APPENDICES**

COMES NOW, Raul Garcia, appellant, by and through the undersigned counsel, and respectfully requests that this Court enter an Order extending the time in which Appellant Garcia may file his Opening Brief and Appendices in the above-entitled matter for a period of thirty (30) days, to and including December 6, 2021. This motion is made pursuant to Nevada Rule of Appellate Procedure (NRAP) 31(b)(3) and the attached Declaration of Counsel. One prior extension has been requested in this matter.

DATED this 5th of November, 2021.

/s/ LYN E. BEGGS
LYN E. BEGGS, ESQ.
316 California Ave. #863
Reno, NV 89509
Attorney for Appellant

DECLARATION OF COUNSEL

I, LYN E. BEGGS, do hereby declare under penalty of perjury that the assertions of this declaration are true.

1. I am an attorney licensed in the State of Nevada and am appointed counsel for Appellant in this matter.
2. That affiant is requesting an extension of time of thirty days to file Appellant's Opening Brief which is currently due November 5, 2021.
3. Additional time to complete the draft is required due to unexpected events which required counsel's time and in order to complete the appendices in this matter which has an extensive procedural history.
4. One prior request for an extension of time has been requested in this matter.
5. That this motion is made in good faith and not for the purpose of delay.

By: s/ LYN E. BEGGS
LYN E. BEGGS, ESQ.
Attorney for Appellant

CERTIFICATE OF SERVICE

I certify that I, Lyn E. Beggs, Esq., am counsel for the Appellant in this matter, and that on this date I electronically filed the Motion for Extension of Time in Which to File Opening Brief and Appendices with the Clerk of the Court by using the ECF system which will send a notice of filing to all parties pursuant to the master list:

Kevin Naughton, Esq.
Washoe County District Attorney's Office
P.O. Box 11130
Reno, NV 89520

DATED this 5th day of November, 2021.

/s/ LYN E. BEGGS
LYN E. BEGGS, ESQ.