

CASEY ALAN JOHNS,

V.

STATE OF NEVADA,

Respondent.

Electronically Filed
Feb 23 2022 12:40 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Supreme Court No. 83064

COMES NOW, Appellant Casey Alan Johns, by and through counsel, Victoria T. Oldenburg, and respectfully moves for a thirty (30) day extension of time within which to file the Opening Brief and Appendices in the above-entitled matter, to and including March 31, 2022. This request is made pursuant to NRAP 26(b) and the attached Declaration of Counsel.

DATED this 23rd day of February, 2022.

VICTORIA T. OLDENBURG, ESQ.
Oldenburg Law Office
Nevada State Bar No. 4770
Counsel for Appellant

DECLARATION OF VICTORIA T. OLDENBURG

1. I am an attorney duly licensed to practice law in the State of Nevada and am the appointed counsel of Appellant Casey Alan Johns on his direct appeal of his conviction currently pending before this Honorable Court.

2. Appellant's Opening Brief and Appendix are currently due March 1, 2022.

3. Appellant was sentenced to a term of 14 years 5 months to 38 years. I have made significant progress on the brief but have not yet completed the same due to the nature of the issues on appeal. In order to present all issues completely and intelligently additional research and review of the discovery in the case is necessary and cannot be completed before March 1, 2022.

4. I have been granted one 30-day extension in this case.

5. I contacted Priscilla Baker, Deputy District Attorney, Churchill County, Nevada, attorney for Respondent, and she does not oppose this Motion.

6. This Motion for Extension of Time is made in good faith and not for the purpose of delay or other improper purpose.

Dated this 23rd day of February, 2022.

/s/ Victoria T. Oldenburg

VICTORIA T. OLDENBURG, ESQ
Nevada State Bar No. 4770
Attorney for Appellant

CERTIFICATE OF SERVICE

Electronically

I hereby certify that on this date the foregoing document was filed electronically with the Nevada Supreme Court. Electronic service of the foregoing document shall be made in accordance with the Master Service List as follows:

Churchill County District Attorney
Priscilla Baker, Deputy District Attorney

Aaron D. Ford
Nevada Attorney General

DATED this 23rd day of February, 2022.

Victoria T. Oldenburg
Attorney for Appellant