

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

---

THE STATE OF NEVADA, )  
)  
Petitioner, )  
vs. )  
THE EIGHTH JUDICIAL DISTRICT )  
COURT OF THE STATE OF NEVADA, )  
IN AND FOR THE COUNTY OF CLARK; )  
AND THE HONORABLE MONICA )  
TRUJILLO, DISTRICT JUDGE, )  
)  
Respondents, )  
and )  
BRANDON ALEXANDER MCGUIRE, )  
Real Party in Interest. )  
\_\_\_\_\_)

Electronically Filed  
Aug 17 2021 11:31 a.m.  
Case No. 83269  
Elizabeth A. Brown  
Clerk of Supreme Court

**REAL PARTY IN INTEREST'S MOTION FOR LEAVE TO FILE  
SUPPLEMENTAL APPENDIX TO  
ANSWER TO EMERGENCY PETITION FOR WRIT**

Comes Now Real Party In Interest, by and through Chief Deputy Public Defender, KATHLEEN HAMERS, and moves this Honorable Court for leave to file a Supplemental Appendix to Answer to Emergency Petition for Writ. This Motion is based upon the attached Declaration of Counsel.

DATED this 17th day of August, 2021.

DARIN F. IMLAY  
CLARK COUNTY PUBLIC DEFENDER

By: /s/ Kathleen Hamers  
KATHLEEN HAMERS, #9042  
Chief Deputy Public Defender

## **DECLARATION OF KATHLEEN HAMERS**

1. I am an attorney licensed to practice law in the State of Nevada; I am a deputy public defender assigned to represent BRANDON MCGUIRE in this matter; I am familiar with the procedural history of this case.

2. Real Party In Interest's answer to Petition for Writ was filed on August 11, 2021. At the time of filing of the Answer, the transcript from July 19, 2021 hearing had not been transcribed. The transcript has now been received by declarant.

3. Accordingly, I am requesting that this Honorable Court grant Real Party in Interest leave to submit the Supplemental Appendix to the Answer to Emergency Petition for Writ to assist in this Honorable Court's decision on instant Petition for Writ.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on the 17th day of August, 2021.

/s/ Kathleen Hamers

KATHLEEN HAMERS

## **CERTIFICATE OF SERVICE**

I hereby certify that this document was filed electronically with the Nevada Supreme Court on the 17th day of August, 2021. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

AARON D. FORD  
ALEXANDER CHEN

KATHLEEN M. HAMERS  
SHANA BROUWERS

I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage pre-paid, addressed to:

MONICA TRUJILLO  
District Court, Department III  
200 Lewis Avenue  
Las Vegas, NV 89101

BY /s/ Carrie M. Connolly  
Employee, Clark County Public  
Defender's Office