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Attorney for Appellant

Electronically Filed
Nov 23 2021 10:30 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

IN THE SUPREME COURT OF THE STATE OF NEVADA

VANESHIA OLIVER,

Appellant,

vs.

THE STATE OF NEVADA,

Respondent.

Supreme Court No.:83276

District Court No.: C351676
Dept. No.: XVII

MOTION FOR EXTENSION OF TIME

COMES NOW, Appellant, VANESHIA OLIVER, by and through his attorney, MARTIN HART, ESQ. of The Law Offices of Martin Hart, LLC., and moves this Honorable Court for an Order extending the time by sixty (60) days from today, though and including January 23, 2022, within which to file the Opening Brief. This motion is based on the following memorandum and all papers and pleadings on file herein.

DATED this 23rd day of November, 2021.

By: /s/ Martin Hart
MARTIN HART
Nevada Bar No. 5984
526 S. 7th St.
Las Vegas, NV 89101
(702) 380-4278

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 I, MARTIN HART, am a duly licensed attorney in the State of Nevada and
3 am represent the appellant.

4 Appellant's Opening Brief is currently due November 24, 2021. This Court
5 may extend the time to file an Opening Brief upon a showing of good cause.
6 NRAP 31(b)(3). At the end of August 2021, I took over most of the court
7 appointed cases assigned to Dan Bunin after he tragically passed away while on
8 vacation. I did not receive his files that were available until the second week of
9 September and many did not have contact information for the clients nor legible
10 notes. I have spent countless hours getting familiar with those cases and attempting
11 to contact clients. With the change in court procedures due to covid and taking
12 over new cases I find myself in hearings most days five or more hours. The
13 majority of the transcripts in this case were filed on September 14, 2021. I have not
14 completed the briefing and am requesting an addition sixty (60) days within which
15 to file the opening brief and appendix.

16 I declare under penalty of perjury the factual representations set forth in the
17 foregoing memorandum are true and correct.

18 DATED this 23rd day of November, 2021.

19
20 By: /s/ Martin Hart
21 MARTIN HART
22 Nevada Bar No. 5984
23 526 S. 7th St.
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ALEXANDER CHEN
Clark County District Attorney

/s/ Martin Hart
MARTIN HART Esq.