## IN THE SUPREME COURT OF THE STATE OF NEVADA

R. H-I.,

Appellant,

VS.

Electronically Filed Jan 03 2022 12:47 p.m. Elizabeth A. Brown Clerk of Supreme Court Case No. 83313

THE STATE OF NEVADA,

Respondent.

## MOTION FOR EXTENSION OF TIME TO FILE OPENING BRIEF OR FOR DISMISSAL OF APPEAL

Comes Now Appellant, R H-I, by and through Deputy Public Defender, James Robison, and moves for an extension of time of thirty (30) days from Monday, January 3, 2022 through and including Wednesday, February 2, 2022 to file the Opening Brief or for the filing of a Motion to Dismiss the Appeal. This Motion is based upon the attached Declaration of counsel.

DATED this 3<sup>rd</sup> day of January, 2022.

DARIN F. IMLAY CLARK COUNTY PUBLIC DEFENDER

By <u>/s/ James H. Robison</u> JAMES H. ROBISON, #9467 Chief Deputy Public Defender

## **DECLARATION OF JAMES H. ROBISON**

1. I am an attorney duly licensed to practice law in the State of Nevada and the Chief Deputy Public Defender assigned to represent R. H-I., on appeal currently pending before this Court.

2. The Notice of Appeal in this matter was filed July 26, 2021.

3. The opening brief was due to be filed December 1, 2021.

4. On November 30, 2021, a Stipulation was filed requesting an extension of time to file the opening brief.

5. On December 2, 2021, this Honorable Court filed an Order approving the stipulation, making the Opening Brief due January 3, 2022.

6. Declarant is working with Nadia Hojjat, Deputy Public Defender on the sexual assault team in the Clark County Public Defender's office. Ms. Hojjat has been assisting in the preparation and/or resolution of the appeal of this matter.

7. Declarant is requesting additional time to discuss the finalization of the matter with Ms. Hojjat and allow for time to contact the Appellant with regard to resolution of the appeal.

Accordingly, I am requesting that this Honorable Court grant an extension of time of thirty (30) days to finalize this matter.

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

EXECUTED on the 3<sup>rd</sup> day of January, 2022.

<u>/s/ James H. Robison</u> JAMES H. ROBISON

## **CERTIFICATE OF SERVICE**

I hereby certify that this document was filed electronically with the Nevada Supreme Court on the 3<sup>rd</sup> day of January, 2022. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

AARON D. FORD ALEXANDER CHEN JONATHAN VANBOSKERCK JAMES H. ROBISON

BY <u>/s/ Carrie M. Connolly</u> Employee, Clark County Public

Defender's Office