IN THE SUPREME COURT OF THE STATE OF NEVADA

WILLIAM JOSEPH MCCAFFREY, Appellant,)))	Electronically Filed Feb 18 2022 09:31 a.m Elizabeth A. Brown No. 8338 Clerk of Supreme Cour
vs.)	
THE STATE OF NEVADA,)))	
Respondent.)	
	/	

MOTION FOR EXTENSION TO FILE OPENING BRIEF AND APPENDIX

[Second Request]

The Appellant William Joseph McCaffrey, by and through his court appointed counsel Edward T. Reed, Esq., hereby respectfully requests a second extension of 14 days from the opening brief's current due date of February 18, 2022, to and including March 4, 2022, to file the opening brief and appendix. There has been one previous extension of time to file the opening brief and appendix, from the brief's original due date of January 19, 2022, to February 18, 2022. This motion is based on the attached memorandum of points and authorities and the declaration of Edward T.

1	Reed, incorporated herein.		
2	DATED this 18 th day of February, 2022.		
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4	/s/ Edward T. Reed		
5	EDWARD T. REED, PLLC		
6	Nevada State Bar No. 1416 P.O. Box 34763		
7	Reno, NV 89533		
8	(775) 996-0687 Attorney for Appellant		
9	Attorney for Appenant		
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MEMORANDUM OF POINTS AND AUTHORITIES

This motion is filed pursuant to NRAP 27 and NRAP 31(b)(3). The reason for the second extension of time request is that in preparing the opening brief, some questions have come to light pertaining to assertions made by the Appellant in his petition for writ of habeas corpus in this case, and the undersigned counsel needs some additional time to confer with the Appellant about these matters which include factual matters and legal issues. For that reason, the undersigned counsel respectfully requests that this additional time be given to be able to consult with Mr. McCaffrey.

For all the foregoing reasons, the undersigned counsel hereby respectfully requests an additional 14 days, from February 18, 2022, to and including March 4, 2022, to complete and file the opening brief and No further extensions of time should be required absent appendix. extraordinary and unforeseen circumstances.

Respectfully submitted this 18th day of February, 2022.

/s/ Edward T. Reed EDWARD T. REED, PLLC Nevada State Bar No. 1416 P.O. Box 34763 Reno, NV 89533 (775) 996-0687 Attorney for Appellant

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DECLARATION OF EDWARD T. REED

- I, Edward T. Reed ("declarant") declare under penalty of perjury as follows:
 - Declarant was appointed counsel for Appellant for purposes of Appellant's appeal to the Nevada Supreme Court.
 - The factual assertions made in the foregoing Motion for Extension of
 Time to File Opening Brief and Appendix are true and made upon
 personal knowledge.
 - This motion is not frivolous or made for any purposes of delay.
 I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 18, 2022.

/s/ Edward T. Reed EDWARD T. REED

CERTIFICATE OF SERVICE

I hereby certify that I represent the Appellant in this matter and that on this date I electronically filed the foregoing with the Clerk of the Supreme Court by using the ECF system which will send a notice of electronic filing to the following: Jennifer Noble, Chief Appellate Deputy Washoe County District Attorney's Office DATED this 18th day of February, 2022.

> /s/ Edward T. Reed EDWARD T. REED