

IN THE SUPREME COURT OF THE STATE OF NEVADA

WILLIAM JOSEPH MCCAFFREY,
Appellant,
vs.
THE STATE OF NEVADA,
Respondent.

Electronically Filed
Feb 18 2022 09:31 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

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 18th day of February, 2022.

3
4 /s/ Edward T. Reed
5 EDWARD T. REED, PLLC
6 Nevada State Bar No. 1416
7 P.O. Box 34763
8 Reno, NV 89533
9 (775) 996-0687
10 Attorney for Appellant
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2 This motion is filed pursuant to NRAP 27 and NRAP 31(b)(3). The
3 reason for the second extension of time request is that in preparing the
4 opening brief, some questions have come to light pertaining to assertions
5 made by the Appellant in his petition for writ of habeas corpus in this case,
6 and the undersigned counsel needs some additional time to confer with the
7 Appellant about these matters which include factual matters and legal issues.
8 For that reason, the undersigned counsel respectfully requests that this
9 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 appendix. No further extensions of time should be required absent extraordinary and unforeseen circumstances.

Respectfully submitted this 18th day of February, 2022.

22	<u>/s/ Edward T. Reed</u>
23	EDWARD T. REED, PLLC
24	Nevada State Bar No. 1416
25	P.O. Box 34763
26	Reno, NV 89533
	(775) 996-0687
	Attorney for Appellant

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Jennifer Noble, Chief Appellate Deputy
Washoe County District Attorney's Office

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/s/ Edward T. Reed
EDWARD T. REED