

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

WAYNE MICHAEL CAMERON,  
Appellant.

v.

STATE OF NEVADA,  
Respondent.

Electronically Filed  
Jan 18 2022 12:14 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

Case No. 83531

**MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S  
OPENING BRIEF AND APPENDIX**

COMES NOW, Appellant, WAYNE MICHAEL CAMERON, and moves this Honorable Court for an Order granting him an extension of time to file the Appellant's Opening Brief of thirty (30) days, until Friday, February 18, 2022.

This is the first extension of time sought. Presently, the brief is due on January 19, 2022.

This Motion is brought pursuant to NRAP 26(b)(1), 27(b) and (c), and 31(1)(A).

The within Motion is based upon the accompanying Declaration of Counsel.

DATED this 18<sup>th</sup> day of January, 2022.

Respectfully submitted,

RICHARD F. CORNELL, P.C.  
150 Ridge Street, 2<sup>nd</sup> Floor  
Reno, Nevada 89501

By: /s/RichardCornell  
Richard F. Cornell

## **DECLARATION OF COUNSEL**

STATE OF NEVADA     )  
                                      )ss.  
COUNTY OF WASHOE)

RICHARD F. CORNELL, under penalty of perjury, swears and declares as follows:

1. Counsel is counsel for the Appellant, WAYNE MICHAEL CAMERON.
2. Counsel makes this declaration in support of his Motion for Extension of Time to File Appellant's Opening Brief and Appendix.
3. The undersigned has obtained the entire trial transcript and had copies of transcripts from numerous pre-trial proceedings litigated by trial counsel.
4. The undersigned was retained by William J. Routsis, Esq. to work with him on the appeal in the United States Court of Appeals for the Ninth Circuit, Darren Roy Mack v. Warden. The undersigned has found this to be one of the most complex appeals that the undersigned has handled in 44 years. In working with counsel of record, we have had to get two extensions of time on that brief. The project that I anticipated taking one week has now taken three. As of today, I have been informed that it still requires additional edits.
5. It is the undersigned's intent, upon finishing Mack, to devote as much attention as possible to Jenkins v. State, No. 83465, and to this case. If the

undersigned is not able to complete it by February 18, a second motion will seek a short extension.

Your Declarant swears and declares under penalty of perjury that the foregoing assertions of fact are true and correct. Further, statements of opinion herein are the undersigned's own, and are based upon 44 years of the practice of law.

DATED this 18<sup>th</sup> day of January, 2022, and executed under penalty of perjury in the city of Reno, county of Washoe, state of Nevada.

RichardCornell  
RICHARD F. CORNELL

## **CERTIFICATE OF SERVICE**

The undersigned does hereby swear and declare under penalty of perjury that they are an employee of RICHARD F. CORNELL, P.C., and that on the 18<sup>th</sup> day of January, 2022, they caused a true and correct copy of the preceding document to be served upon all necessary parties by way of electronic service through the Court's E-flex filing system, addressed as follows:

Washoe County District Attorney's Office  
Appellate Division  
1 South Sierra Street, 7<sup>th</sup> Floor  
Reno, Nevada 89501  
[da@washoecounty.us](mailto:da@washoecounty.us)

DATED this 18<sup>th</sup> day of January, 2022.

/s/KathrynOBryan  
Kathryn O'Bryan