

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

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THE STATE OF NEVADA,	)	Electronically Filed
	)	Mar 03 2022 09:06 a.m.
Petitioner,	)	Elizabeth A. Brown
vs.	)	Clerk of Supreme Court
THE EIGHTH JUDICIAL DISTRICT	)	CASE NO. 84134
COURT OF THE STATE OF NEVADA,	)	
IN AND FOR THE COUNTY OF CLARK;	)	
AND THE HONORABLE TIERRA	)	
DANIELLE JONES, DISTRICT JUDGE,	)	
Respondents,	)	
and	)	
JOHN EUGENE DOANE,	)	
Real Party In Interest,	)	
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**REAL PARTY IN INTEREST MOTION FOR EXTENSION OF TIME**

Comes Now Real Party In Interest, JOHN EUGENE DOANE, by and through Chief Deputy Public Defender DAVID LOPEZ-NEGRETE, and moves for an extension of time of thirty-two (32) days from Friday, March 4, 2022 through and including Tuesday, April 5, 2022 to file the Real Party In Interest's Answer to Petition for Writ in this case. The grounds for this request are described in the attached Declaration.

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

DARIN F. IMLAY  
CLARK COUNTY PUBLIC DEFENDER

By /s/ David Lopez-Negrete  
DAVID LOPEZ-NEGRETE, #12027  
Chief Deputy Public Defender

## **DECLARATION OF DAVID LOPEZ-NEGRETE**

1. I am an attorney licensed to practice law in the State of Nevada; I am a chief deputy public defender assigned to handle the appellate issues in this matter; I am familiar with the procedural history of this case.

2. The State of Nevada filed the Petition for Writ of Mandamus and/or Prohibition on January 26, 2022. On February 4, 2022, this Honorable Court filed an Order Directing Answer directing real party in interest to file an answer to petition for writ by Friday, March 4, 2022.

3. Declarant has reviewed the entirety of the Petition for Writ of Mandamus and/or Prohibition and has outlined his response.

4. During the preparation of the answer to writ, Declarant realized that it is necessary to discuss the answer with the second chair public defender on the case. Due to illness and scheduling issues, declarant will need additional time to thoroughly review and discuss the answer with co-counsel.

5. Declarant may also need to discuss the answer to writ with real party in interest Doane. Doane is currently housed in High Desert State Prison and additional time will be necessary to allow communications between Declarant and Doane.

6. I am asking for an extension of thirty-two (32) days within which to complete and file Real Party In Interest's Answer to Petition for Writ.

7. This motion is made in good faith and not for the purpose of delay.

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

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

/s/ David Lopez-Negrete  
DAVID LOPEZ-NEGRETE

## **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 March, 2022. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

AARON D. FORD  
TALEEN PANDUKHT  
ALEXANDER CHEN

DAVID LOPEZ-NEGRETTE

I further certify that I served a copy of this document by electronic emailing a true and correct copy thereof to:

JUDGE TIERRA JONES

Email: DriverT@clarkcountycourts.us

BY /s/ Carrie M. Connolly  
Employee, Clark County Public  
Defender's Office