

IN THE SUPREME COURT OF THE STATE OF NEVADA

JAYLON RANDOLPH,

Appellant,

v.

STATE OF NEVADA,

Respondent.

Docket No. 84378

Electronically Filed
Jul 11 2022 02:54 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

MOTION FOR ENLARGEMENT OF TIME (FIRST REQUEST)

COMES NOW, JAYLON RANDOLPH, by and through his counsel of record, MONIQUE MCNEILL, ESQ., and hereby moves this Court for an enlargement of time of SIXTY (60) days from July 28, 2022 to file the Opening Brief. This is the first request. Counsel moves to set the opening brief to be due September 28, 2022. This motion is based on the following memorandum and all papers and pleadings on file herein.

DATED this 11th day of July , 2022.

By:

/s/Monique McNeill
Monique McNeill,
Nevada Bar No. 9862
P.O. Box 2451
Las Vegas, Nevada 89125

MEMORANDUM

I, MONIQUE MCNEILL, ESQ., am the attorney in the above captioned case. Pursuant to NRAP31(b)(3)(B), this Court may grant a first motion for extension of time for filing a brief upon a showing of good cause. This is Appellant's first request for an extension of time.

Appellant's Opening Brief is due July 28, 2022. After meeting with Mr. Randolph and reviewing the record, counsel has discovered that there are additional transcripts required beyond those already prepared. It was not readily apparent from the record until counsel spoke with the defendant that the additional transcripts would be required. Counsel was not counsel of record until after the judgment of conviction was filed, so counsel had not independent knowledge.

Further, counsel's workload from the back log of trials along with new cases has increased significantly and counsel needs more time to request the transcripts and prepare the appeal. Counsel has requested the transcripts prior to filing this motion.

///

///

///

This Motion is made in good faith and not for the purposes of undue delay. I declare under penalty of perjury the factual representations set forth in the foregoing memorandum are true and correct.

DATED this 11th day of July, 2022.

By:

/s/Monique McNeill
Monique McNeill,
Nevada Bar No. 9862

CERTIFICATE OF SERVICE

I HEREBY CERTIFY AND AFFIRM that this document was filed electronically foregoing document shall be made in accordance with the Master Service List as follows: AARON FORD, ESQ ALEXANDER G. CHEN, ESQ.

By: ____/S/ Monique McNeill_____