

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

2
3 ADAM ANTHONY BERNARD,

4 Appellant,

5 vs.

6 STATE OF NEVADA,

7 Respondent.

Electronically Filed
No. 83323 Mar 14 2022 08:45 a.m.

Elizabeth A. Brown
SECOND MOTION FOR AN
EXTENSION OF TIME
Clark County Supreme Court

8
9 Counsel for Appellant hereby respectfully requests that this Court grant
10 another extension of time by which Appellant, Adam Anthony Bernard, may file
11 his Opening Brief pursuant to NRAP 31(b)(3). Appellant's Opening Brief is due
12 on March 14, 2022, as the result of this Court's Order granting Appellant's prior
13 Motion for an Extension of Time.

14 Originally, the Opening Brief in this matter was due on December 2, 2021.
15 After Appellant's telephonic request to continue was granted, the Brief was due
16 on December 16, 2021. The parties then stipulated to an extension until February
17 28, 2022. Subsequently, the Court granted Appellant's Motion and extended the
18 due date to March 14, 2022.

19 Neither of the prior three requests, Appellant's Motion for an Extension of
20 Time, the Stipulation to An Extension of Time, and the telephonic request for an
21 extension, were denied by this Court.

22 Counsel is still unable to finish the Opening Brief by March 14, 2022.
23 While her health has improved significantly, she is still suffering from migraines
24 and fatigue, which have made completing the brief while performing her daily
25 workload, very difficult.

26
27 Appellant was sentenced to a 10-year prison term and counsel wants to
28 ensure that the brief effectively addresses all of Appellant's issues.

1 Counsel is requesting an additional three-week extension, until April 4,
2 2022, to file Mr. Bernard's Opening Brief. This request is being made in good
3 faith and not for purposes of delay.

4 Counsel for Appellant certifies that the information provided in this Motion
5 for an Extension of Time is true and complete to the best of her knowledge,
6 information and belief.

7
8 Dated this 14th day of March, 2022.
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13 Maria Pence, Esq.

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18 Attorney for Appellant Bernard
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CERTIFICATE OF SERVICE

I certify that I am an employee of PENCE & ASSOCIATES and that on this date, I served a true and correct copy of the Second Motion for an Extension of Time to the following address:

Erik Levin, Chief Criminal Deputy District Attorney
District Attorney's Office
1038 Buckeye Road
Minden, NV 89423

Dated this 14th day of March, 2022.



MARIA PENCE, ESQ.