

IN THE SUPREME COURT OF THE STATE OF NEVADA

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| JACOB DANIEL GOSSELIN, |) | Electronically Filed Mar 11 2022 10:01 a.m. Elizabeth A. Brown Clerk of Supreme Court |
| |) | |
| Appellant, |) | Supreme Court No. 83674 |
| |) | |
| v. |) | |
| |) | |
| STATE OF NEVADA, |) | |
| |) | |
| Respondent. |) | |
| | / | |

MOTION FOR ENLARGEMENT OF TIME

COMES NOW, Appellant Jacob Daniel Gosselin, by and through counsel, Victoria T. Oldenburg, and respectfully moves for a thirty (30) day extension of time within which to file the Opening Brief and Appendix in the above-entitled matter, to and including April 15, 2022. This request is made pursuant to NRAP 26(b) and the attached Declaration of Counsel.

DATED this 11th day of March, 2022.

VICTORIA T. OLDENBURG, ESQ.
Oldenburg Law Office
Nevada State Bar No. 4770
Counsel for Appellant

DECLARATION OF VICTORIA T. OLDENBURG

1. I am an attorney duly licensed to practice law in the State of Nevada and am the appointed counsel for Appellant Jacob Daniel Gosselin on his direct appeal of his conviction currently pending before this Honorable Court.

2. Appellant's Opening Brief and Appendix are currently due March 16, 2022.

3. Appellant is in the process of making an important decision regarding his appeal and has requested an in-person meeting with me. Appellant is incarcerated at Lovelock Correctional Center which just recently opened for in-person visitation. However, Appellant's attorney visiting time is on Sundays from 7:00 a.m. to 9:00 a.m., and the attorney is required to be at the facility 45 minutes prior, at 6:15 a.m., in order to take a COVID test. This would require counsel to leave her office at 4:00 a.m. in order to arrive on time, which is currently not workable. Lovelock Correctional Facility is not permitting video visitation between attorneys and their clients. I am in the process of trying to arrange a behind-the-glass visit for a time during the workweek but have been informed those visits are also very limited. As of this time I have not been able to schedule a workable time to visit with Mr. Gosselin but am hoping that I will be able to do so within the next 30 days. Based upon these visiting issues I cannot submit the Opening Brief by March 16, 2022.

4. This is my first request for an extension of time.
5. I contacted Jennifer P. Noble, Chief Appellate Deputy, Washoe County District Attorney's Office, and she does not oppose this Motion.
6. This Motion for Extension of Time is made in good faith and not for the purpose of delay or other improper purpose.

Dated this 11th day of March, 2022.

/s/ Victoria T. Oldenburg

VICTORIA T. OLDENBURG, ESQ
Nevada State Bar No. 4770
Attorney for Appellant

CERTIFICATE OF SERVICE

Electronically

I hereby certify that on this date the foregoing document was filed electronically with the Nevada Supreme Court. Electronic service of the foregoing document shall be made in accordance with the Master Service List as follows:

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

Aaron D. Ford
Nevada Attorney General

DATED this 11th day of March, 2022.

Victoria T. Oldenburg
Attorney for Appellant