

FILED

FEB 18 2000

by JAMETTE M. BLOOM
CLERK OF SUPREME COURT
DEPUTY CLERK

IN THE SUPREME COURT OF THE STATE OF NEVADA

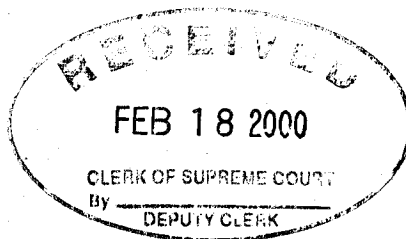
SIAOSI VANISI,) Case No. 35249
)
Appellant,)
)
vs.)
)
THE STATE OF NEVADA,)
)
Respondent.)

MOTION FOR EXTENSION OF TIME TO FILE OPENING BRIEF

Appellant, by and through his counsel, and pursuant to Supreme Court Rule 250(6)(e), hereby applies for an extension of Sixty (60) days to April 17, 2000, within which to file his Opening Brief in the above-entitled case. The reason for this request is set forth in the attached affidavit.

DATED this 15 day of February 2000.

MICHAEL R. SPECCHIO
Washoe County Public Defender



By [Signature]
JOHN REESE PETTY
Chief Deputy

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5 IN THE SUPREME COURT OF THE STATE OF NEVADA
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8 SIAOSI VANISI,) Case No. 34249
9)
10 Appellant,)
11)
12 vs.)
13)
14 THE STATE OF NEVADA,)
15)
16 Respondent.)
17)
18)
19)
20)
21)
22)
23)
24)
25)
26)

14
15 AFFIDAVIT

16 STATE OF NEVADA)
17 : ss.
18 COUNTY OF WASHOE)
19)
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22)
23)
24)
25)
26)

19 JOHN REESE PETTY, under penalty of perjury, deposes and
20 says:

- 21 1. That your affiant is counsel on appeal for Appellant;
22 2. That although no scheduling order appears to have yet
23 issued in this appeal it appears that Appellant's Opening Brief
24 is due on or about February 16, 2000;

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1 3. That due to an extremely heavy caseload at the present
2 time, completion of a quality brief is not possible in the time
3 allotted;

4 4. As an example of that case load please be advised that
5 your Affiant was the only appellate deputy for the Washoe County
6 Public Defender's Office from September 7, 1999 to January 3,
7 2000 due to the maternity leave by Deputy Public Defender Cheryl
8 Bond; and that further that Ms. Bond was only back part time in
9 January (covering approximately ten (10) working days); and
10 further, your Affiant has been handling the complete appellate
11 case load for five months -- including the completion of four (4)
12 briefs in January (one which was a reply brief in a death penalty
13 case);

14 5. That your Affiant is the full-time Appellate Deputy at
15 the Office of the Washoe County Public Defender assigned to this
16 appeal, and has approximately twenty (20) cases at one stage or
17 another in the appellate process not including those cases which
18 have been submitted for decision; and further, that your Affiant
19 has been diligently moving this case load along -- and intends to
20 have filed, this month, four (4) briefs and two (2) fast track
21 statements;

22 6. That your Affiant's other duties as a Chief Deputy, as
23 well as some vacation scheduling, has also taken time from
24 research and writing in this case;

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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the Washoe County Public Defender's Office, Reno, Washoe County, Nevada, and that on this date I forwarded a true copy of the foregoing document through the US mail and/or the Washoe County inter-office mail system, as addressed, to:

Gary Hatlestad, Appellate Deputy
Washoe County District Attorney's Office
VIA INTER-OFFICE MAIL

Siaosi Vanisi # 63376
Ely State Prison
PO Box 1989
Ely NV 89301

DATED this 25th day of February, 2000.

Kellie Roberson