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

3 **ALFRED P. CENTOFANTI, III,**

4 **Appellant,**

5 **vs.**

6 **THE STATE OF NEVADA,**

7 **Respondent.**

No.: 58562

DC No.: C17-534  
Electronically Filed  
May 11 2012 11:00 a.m.  
Tracie K. Lindeman  
Clerk of Supreme Court

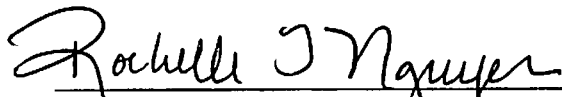
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10 **APPELLANT'S MOTION TO EXPAND TIME TO FILE REPLY BRIEF**

11 COMES NOW, Appellant, Alfred P. Centofanti, III, by and through his attorney,  
12 Rochelle T. Nguyen, Esq., of NGUYEN & LAY, and respectfully requests this Court allow  
13 leave to expand time to file opening brief by thirty (30) days, from May 23, 2012 to June 23,  
14 2012, for the reasons set forth in the points and authorities therein and the attached  
15 declaration of counsel.

16 Dated this 11<sup>th</sup> day of May, 2012.

17 Respectfully Submitted.

18 NGUYEN & LAY

19   
20 ROCHELLE T. NGUYEN, ESQ.

Nevada State Bar No. 008205

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1 **POINTS AND AUTHORITES**

2 NRAP Rule 26(b)(1)(A) provides as follows:

3 For good cause, the court may extend the time prescribed by these Rules or by its  
4 order to perform any act, or may permit an act to be done after that time expires.

5 **DECLARATION OF ROCHELLE T. NGUYEN, ESQ.**

6 ROCHELLE T. NGUYEN, ESQ., declares under penalty of perjury:

7 1. That I am a licensed attorney practicing law in the State of Nevada, and that I  
8 have been appointed to represent the Appellant, ALFRED P. CENTOFANTI, III., in the  
9 above-captioned case.

10 2. That the Appellant is making this request in good faith so that he be allowed  
11 additional time to fully investigate, research and raise meritorious issues to this Honorable  
12 Court.

13 3. That the Appellant's Reply Brief is currently due on May 23, 2012.

14 4. That the Petition for Writ of Habeas Corpus (post-conviction) that this appeal  
15 stems from was 334 pages in length, with approximately 2,000 of exhibits.


16 5. That the district court conducted an evidentiary hearing, allowed for video-  
17 taped deposition testimony and took the matter under advisement for nearly 8 (eight) months  
18 before issuing a written Order.

19 6. That the State's Response was filed on April 23, 2012. Their brief was  
20 twenty-one (21) pages in length.

21 7. That, due to the volume of the instant case, and the number and complexity of  
22 the issues presented for appeal, the Declarant requires an additional time to file the  
23 Appellant's Reply Brief.

24 8. That the Declarant respectfully request that the Court allow for an additional  
25 thirty (30) days to file the Appellant's Reply Brief. This request is made in good faith and not  
26 for purposes of delay. This is the first request for a continuance of the reply brief.

27 Dated this 11<sup>th</sup> day of May, 2012.


28   
ROCHELLE T. NGUYEN, ESQ.

1  
2 **CERTIFICATE OF SERVICE**

3 The undersigned hereby declares that on the 11<sup>th</sup> day of May, 2012, a true and correct copy  
4 of the foregoing Appellant's Motion to Expand time to File Reply Brief was sent via U.S.

5 First-Class mail to the following:  
6

7 Alfred P. Centofanti, III #85237  
8 P.O. Box 650 (HDSP)  
Indian Springs, NV 89018

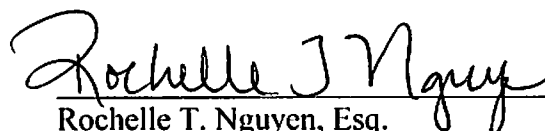
9   
10 ROACHELLE T. NGUYEN, ESQ

11  
12 **CERTIFICATE OF ELECTRONIC TRANSMISSION**

13 The undersigned hereby declares that on May 11, 2012, an electronic copy of the  
14 foregoing Appellant's Motion to Expand time to File Reply Brief was sent via the master  
15 transmission list with the Nevada Supreme Court to the following:

16 STEVEN B. WOLFSON  
17 Clark County District Attorney  
200 South Lewis Street  
18 Las Vegas, Nevada 89101

19 CATHERINE CORTEZ-MASTO  
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