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

8 RONALD ERNEST LAKEMAN,) **Supreme Court No. 64609**
9) District Court Case: C265107
10 Appellant,)
11 vs.)
12 THE STATE OF NEVADA,)
13 Respondent.)

14 **RESPONSE TO MOTION TO STRIKE**

15 **APPELLANT'S OPENING BRIEF AND APPENDIX AND COUNTER MOTION**
16 **TO FILE AMENDED OPENING BRIEF**

17 Comes now, Frederick A. Santacroce, Esq., counsel for Appellant, Ronald
18 Lakeman, and responds to Respondent's Motion to Strike Appellant's Opening Brief
19 and Appendix.
20

21 Appellant has amended and filed his Appendix containing the complete
22 transcripts for the trial days referenced in his Opening Brief. The State now has the
23 complete transcripts necessary to reasonably respond to Appellant's Opening Brief.
24 However, due to the addition of the voluminous transcripts the bates numbers
25 referenced in the Opening Brief do not correspond to the bates numbers in the
26 Amended Appendix. Appellant has prepared and is ready to file an Amended Opening
27 Brief in which only revisions to the Appendix citations were made. Appellant herein,
28 requests permission of this Court to file the Amended Brief.

Wherefore, the Appellant respectfully requests that this Court grant permission to file the Amended Brief and find the State's Motion to Strike moot.

Dated this 10th day of November, 2014.

/s/ Frederick A. Santacroce

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CERTIFICATE OF SERVICE

I hereby certify that this document was filed electronically with the Nevada Supreme Court on November 10, 2014. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Richard A. Wright, Wright, Stanish & Winckler

Stephen Wolfson, District Attorney Clark County

Catherine Cortez-Masto, Attorney General State of Nevada

Dated this 10th day of November, 2014

/s/ Frederick A. Santacroce

On Behalf of Santacroce Law Offices, Ltd.