

IN THE SUPREME COURT OF THE STATE OF NEVADA

* * * * *

FREDERICK HARRIS

Appellant,

vs.

THE STATE OF NEVADA,

Respondent.

S.C. CASE NO. 69093

Electronically Filed
Jun 01 2016 10:45 a.m.
Tracie K. Lindeman
Clerk of Supreme Court

MOTION FOR EXTENSION OF TIME TO FILE OPENING BRIEF

COMES NOW, Christopher R. Oram, Esq., attorney for Appellant, FREDERICK HARRIS, and moves this Court for an Order granting an extension of time of sixteen (16) days from the date the Opening Brief is now due, to wit: June 1, 2016, and extend the time to and including, June 17, 2016, for the filing of the Opening Brief. This motion is made and based upon NRAP 27 and 31(a), the Affidavit of Christopher R. Oram, Esq., filed herewith, and the Points and Authorities attached hereto.

DATED this 1st day of June, 2016.

Respectfully submitted by:

/s/ Christopher R. Oram, Esq.
CHRISTOPHER R. ORAM, ESQ.
Nevada Bar No. 004349
520 S. Fourth Street, 2nd Floor
Las Vegas, Nevada 89101
(702) 384-5563

Attorney for Appellant
FREDERICK HARRIS

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

POINTS AND AUTHORITIES

Time for Serving and Filing Briefs.

The appellant shall serve and file the OPENING brief within one hundred and twenty (120) days after the date on which the appeal is docketed in the Supreme Court. The respondent shall serve and file his answering brief within thirty (30) days after service of the brief of the appellant. After service of respondent's brief, any OPENING brief must be served and filed within thirty (30) days. . . . By written stipulation timely filed with the Supreme Court, the parties may extend the time for filing any brief for a total of thirty (30) additional days unless the court otherwise orders. Applications for extensions of time beyond that to which the parties are permitted to stipulate are not favored, and will be considered only on motion for good cause clearly shown, or ex parte in cases of extreme and unforeseeable emergency. The Supreme Court may shorten the periods prescribed above for serving and filing briefs, either by rule for all cases or for classes of cases, or by order for specific cases."

Mr. Harris' Opening Brief is currently due on June 1, 2016. This is the third request for an extension of time. Mr. Harris is facing a life sentence. The issues presented in this appeal are expected to be voluminous and factually complex. Moreover, the trial in this case was lengthy and the undersigned was not trial counsel.

The undersigned has mostly completed a review of Mr. Harris voluminous file. The undersigned has also completed Mr. Harris' appendix which is approximately 3,500 pages. However, additional time is needed to continue to draft and finalize the Opening Brief. The undersigned apologizes for this additional extension, however, it is necessary that the undersigned be permitted additional time. Moreover, the undersigned is only requesting a short extension of sixteen (16) days.

Therefore, counsel respectfully request that this Court permit him sixteen (16) days in order to properly brief these issues.

DATED this 1st day of June, 2016.

Respectfully submitted by:

/s/ Christopher R. Oram, Esq.
CHRISTOPHER R. ORAM, ESQ.
Nevada Bar #004349
520 S. Fourth Street, 2nd Floor
Las Vegas, Nevada, 89101

Attorney for Appellant
FREDERICK HARRIS

AFFIDAVIT OF CHRISTOPHER R. ORAM
IN SUPPORT OF MOTION FOR EXTENSION OF TIME
TO FILE OPENING BRIEF

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

CHRISTOPHER R. ORAM, ESQ., being first duly sworn, deposes and states:

1. I am an attorney duly licensed to practice law in the State of Nevada. I am counsel for the Appellant in the above-entitled matter. I have personal knowledge of all matters contained herein and am competent to testify thereto.

2. Mr. Harris' Opening Brief is currently due on June 1, 2016. This is the third request for an extension of time. Mr. Harris is facing a life sentence. The issues presented in this appeal are expected to be voluminous and factually complex. Moreover, the trial in this case was lengthy and the undersigned was not trial counsel.

The undersigned has mostly completed a review of Mr. Harris voluminous file. The undersigned has also completed Mr. Harris' appendix which is approximately 3,500 pages. However, additional time is needed to continue to draft and finalize the Opening Brief. The undersigned apologizes for this additional extension, however, it is necessary that the undersigned be permitted additional time. Moreover, the undersigned is only requesting a short extension of sixteen (16) days.

Therefore, counsel respectfully request that this Court permit him sixteen (16) days in order to properly brief these issues.

3. That this motion is made in good faith and not for purposes of delay.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

DATED this 1st day of June, 2016.

/s/ Christopher R. Oram, Esq.
CHRISTOPHER R. ORAM, ESQ.

SWORN and SUBSCRIBED before me
this 1st day of June, 2016.

/s/ Jessie Vargas
NOTARY PUBLIC in and for
said County and State

1 **CERTIFICATE OF SERVICE**

2 I hereby certify and affirm that this document was filed electronically with the Nevada
3 Supreme Court on June 1, 2016. Electronic Service of the foregoing document shall be made in
4 accordance with the Master Service List as follows:

5 ADAM PAUL LAXALT
6 Nevada Attorney General

7 STEVE OWENS
8 Chief Deputy District Attorney

9 CHRISTOPHER R. ORAM, ESQ.

10 BY:

11
12 /s/ Jessie Folkestad
13 An Employee of Christopher R. Oram, Esq.
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CHRISTOPHER R. ORAM, LTD.
520 SOUTH 4TH STREET | SECOND FLOOR
LAS VEGAS, NEVADA 89101
TEL. 702.384-5563 | FAX. 702.974-0623