

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

2 * * * * *

3 FREDERICK HARRIS

4 Appellant,

5 vs.

6 THE STATE OF NEVADA,

7 Respondent.

S.C. CASE NO. 69093

Electronically Filed
Dec 23 2016 09:39 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

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9 **MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF**

10 COMES NOW, Christopher R. Oram, Esq., attorney for Appellant, FREDERICK
11 HARRIS, and moves this Court for an Order granting an extension of time of forty-five (45) days
12 from the date the Reply Brief is now due, to wit: December 23, 2016, and extend the time to and
13 including, February 6, 2017, for the filing of the Reply Brief. This motion is made and based
14 upon NRAP 27 and 31(a), the Affidavit of Christopher R. Oram, Esq., filed herewith, and the
15 Points and Authorities attached hereto.

16 DATED this 23rd day of December, 2016.

17 Respectfully submitted by:

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19 CHRISTOPHER R. ORAM, ESQ.
20 Nevada Bar No. 004349
21 520 S. Fourth Street, 2nd Floor
22 Las Vegas, Nevada 89101
23 (702) 384-5563

24 Attorney for Appellant
25 FREDERICK HARRIS

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1 **POINTS AND AUTHORITIES**

2 Time for Serving and Filing Briefs.

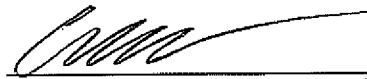
3 The appellant shall serve and file the OPENING brief within one
4 hundred and twenty (120) days after the date on which the appeal is
5 docketed in the Supreme Court. The respondent shall serve and file
6 his answering brief within thirty (30) days after service of the brief
7 of the appellant. After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

18 Mr. Harris' Reply Brief is currently due on December 23, 2016. This is the first request for
19 an extension of time. Mr. Harris is facing a life sentence. The issues presented in this appeal are
20 voluminous and factually complex. Moreover, the trial in this case was lengthy and the
21 undersigned was not trial counsel.

22 The undersigned requires additional time to re-review the briefs and the voluminous
23 record in this case. The Opening Brief and the Answering Brief are lengthy at 65 and 52 pages
24 respectively. Therefore, counsel respectfully request that this Court permit him forty-five (45)
25 days in order to properly reply to these issues.

26 DATED this 23rd day of December, 2016.

27 Respectfully submitted by:

28 

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Attorney for Appellant
FREDERICK HARRIS

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AFFIDAVIT OF CHRISTOPHER R. ORAM
IN SUPPORT OF MOTION FOR EXTENSION OF TIME
TO FILE REPLY 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' Reply Brief is currently due on December 23, 2016. This is the first request for an extension of time. Mr. Harris is facing a life sentence. The issues presented in this appeal are voluminous and factually complex. Moreover, the trial in this case was lengthy and the undersigned was not trial counsel.

The undersigned requires additional time to re-review the briefs and the voluminous record in this case. The Opening Brief and the Answering Brief are lengthy at 65 and 52 pages respectively. Therefore, counsel respectfully request that this Court permit him forty-five (45) days in order to properly reply to these issues.

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

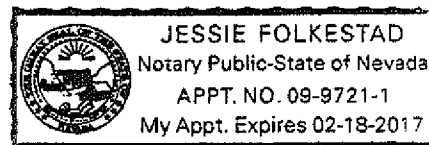
FURTHER YOUR AFFIANT SAYETH NAUGHT.

DATED this 23rd day of December, 2016.


CHRISTOPHER R. ORAM, ESQ.

SWORN and SUBSCRIBED before me
this 23rd day of December, 2016.


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 December 23, 2016. Electronic Service of the foregoing document shall be
4 made in 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.
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