

IN THE SUPREME COURT OF THE STATE OF NEVADA

IN THE MATTER OF THE PARENTAL
RIGHTS AS TO: R.T., K.G-T., N.H-T., AND
E.H-T.,
MINOR CHILDREN,

No. 70210 Electronically Filed
Jul 15 2016 01:16 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

JACQUELINE GUERRERO.,
Appellant,

vs.

WASHOE COUNTY DEPARTMENT OF
SOCIAL SERVICES,
Respondent.

MOTION FOR ENLARGEMENT OF TIME TO FILE APPELLANT'S
OPENING BRIEF

John Reese Petty, counsel for the Appellant, applies for an
extension of time of 10 days, to and including July 29, 2016, within which
to file Appellant's Opening Brief in this appeal. NRAP 31(b)(C). The
reasons for this request are set forth in the attached affidavit.

DATED this 15th day of July 2016.

/s/ John Reese Petty

JOHN REESE PETTY, Chief Deputy
Nevada State Bar Number 10
350 South Center Street, 5th Floor
P.O. Box 11130
Reno, Nevada 89520-0027
(775) 337-4827
jpetty@washoecounty.us

AFFIDAVIT

STATE OF NEVADA)
 : ss.
COUNTY OF WASHOE)


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

1. I am a Chief Deputy in the Washoe County Public Defender's Office and I am Appellant's counsel in this direct appeal. The opening brief in this appeal is due on July 19, 2016. This request is my first—and will be my only—request for additional time to file the opening brief. I am requesting ten additional days to July 29, 2016.

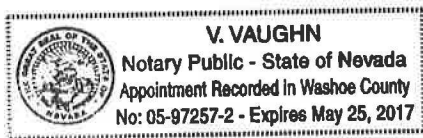
2. I am diligently working on the opening brief and anticipate its completion before the end of the ten days I am requesting. But the record is large. By the district court's count twenty-one witnesses testified over the course of a six-day trial; the Joint Appendix in this matter will be at least seven volumes; six of which collectively contain 1463 pages of trial transcripts.

3. My other duties as a Chief Deputy in this office as well as being called to testify in the post-conviction hearing of James Biela this week, have prevented me from completing the opening brief. Therefore I need the additional time that I am requesting.

4. This motion for an extension of time is made in good faith, and not solely for the purpose of delay.


JOHN REESE PETTY

Subscribed and Sworn to before me this 15th day of July 2016, by John Reese Petty.




NOTARY PUBLIC

CERTIFICATE OF SERVICE

I hereby certify that this document was filed electronically with the Nevada Supreme Court on the 15th day of July 2016. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Tyler Elcano, Deputy District Attorney
Washoe County District Attorney's Office

I further certify that I served a copy of this document by providing a copy to:

Jacqueline Guerrero.

John Reese Petty
Washoe County Public Defender's Office