

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 16 2016 03:28 p.m.  
Tracie K. Lindeman  
Clerk of Supreme Court


**APPELLANT'S MOTION TO ENLARGE  
PAGE LIMITATION ON APPELLANT'S OPENING BRIEF**

COMES NOW, Appellant, FREDERICK HARRIS by and through his attorney, Christopher R. Oram, Esq., and hereby respectfully moves this Honorable Court for its order enlarging the page limitation for the Opening Brief as specified in NRAP 32(A(7)(d).

This Motion is made and based upon the papers and pleadings on file herein as well as the Affidavit attached hereto.

DATED this 16 day of June, 2016.

Respectfully submitted,

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

Attorney for Appellant  
FREDERICK HARRIS

## POINTS AND AUTHORITIES

The Opening Brief the undersigned wishes to file comprises of 15,358 words, 1,358 words over the limitation. Pursuant to NRAP 32(a)(7)(D), the undersigned may ask for permission to exceed the word limit in the Opening Brief.

In support of this request, the undersigned notes that Mr. Harris' case is complex and very voluminous. Mr. Harris has numerous significant issues in his Opening Brief. In order to fully explain the gravity and nature of the issues, it is extremely necessary to ask for this enlargement. Therefore, based on the above and foregoing, it is necessary that the undersigned file a 15,358 word Opening Brief.

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1        **AFFIDAVIT IN SUPPORT OF APPELLANT'S MOTION TO ENLARGE**  
2        **PAGE LIMIT OF APPELLANT'S OPENING BRIEF**

3        STATE OF NEVADA        )  
4        COUNTY OF CLARK        ) ss:

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

6                1.        Affiant CHRISTOPHER R. ORAM, ESQ., is counsel for the  
7        Appellant, FREDERICK HARRIS, in the above-entitled matter. I have personal  
8        knowledge of all matters contained herein and am competent to testify thereto.

9                2.        The Opening Brief the undersigned wishes to file comprises of 15,358  
10       words, 1,358 words over the limitation. Pursuant to NRAP 32(a)(7)(D), the  
11       undersigned may ask for permission to exceed the word limit in the Opening Brief.

12               In support of this request, the undersigned notes that Mr. Harris' case is  
13       complex and very voluminous. Mr. Harris has numerous significant issues in his  
14       Opening Brief. In order to fully explain the gravity and nature of the issues, it is  
15       extremely necessary to ask for this enlargement. Therefore, based on the above and  
16       foregoing, it is necessary that the undersigned file a 15,358 word Opening Brief.

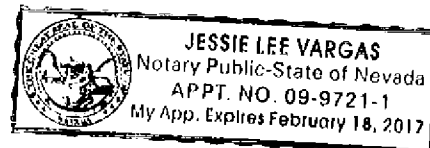
17               3.        Affiant respectfully requests that this Honorable Court grant  
18       Appellant's Motion for an Enlargement of Page Limitation on Appellant's Opening  
19       Brief.

20               Dated this 16 day of June, 2016.

21                                  
22                                CHRISTOPHER R. ORAM, ESQ.

23        SWORN and SUBSCRIBED before me  
24        this 16 day of June, 2016.

25          
26        NOTARY PUBLIC in and for said  
27        County and State



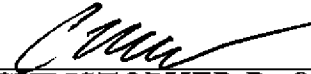
**CERTIFICATE OF COMPLIANCE**

I hereby certify that this brief complies with the formatting requirements of NRAP 32(a)(4), the typeface requirements of NRAP 32(a)(5) and the type style requirements of NRAP 32(a)(6) because this brief has been prepared in a proportionally spaced typeface using 14 point font of the Times New Roman style.

I further certify that this brief complies with the page or type-volume limitations of NRAP 32(a)(7). Pursuant to NRAP 32(a)(7)(d), the undersigned has filed the appropriate motion to exceed page limitation with this appellate brief because excluding the parts of the brief exempted by NRAP 32(a)(7)(C), as it contains more than 14,000 words.

DATED this 16 day of June, 2016.

Respectfully submitted by,

  
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

**CERTIFICATE OF SERVICE**

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on June 10, 2016. Service of the foregoing document shall be made in accordance with the Master Service List as follows:

ADAM PAUL LAXALT  
Nevada Attorney General

STEVE OWENS  
Chief Deputy District Attorney

CHRISTOPHER R. ORAM, ESQ.

BY:

/s/ Jessie Folkestad  
An Employee of Christopher R. Oram, Esq.