



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."

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

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

19 DATED this 23<sup>rd</sup> day of December, 2016.

20 Respectfully submitted by:

21 

22 CHRISTOPHER R. ORAM, ESQ.  
23 Nevada Bar #004349  
24 520 S. Fourth Street, 2nd Floor  
25 Las Vegas, Nevada, 89101

26 Attorney for Appellant  
27 FREDERICK HARRIS  
28

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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.

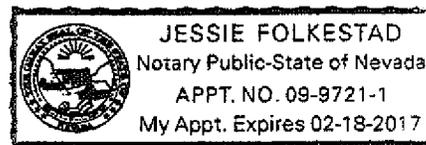
FURTHER YOUR AFFIANT SAYETH NAUGHT.

DATED this 23<sup>rd</sup> day of December, 2016.

  
CHRISTOPHER R. ORAM, ESQ.

SWORN and SUBSCRIBED before me  
this 23<sup>rd</sup> day of December, 2016.

  
NOTARY PUBLIC in and for  
said County and State



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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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