

IN THE SUPREME COURT OF THE STATE OF NEVADA

FREDERICK H. HARRIS, JR.,)

#1149356,)

Appellant,)

v.)

STATE OF NEVADA,)

Respondent.)

_____)

CASE NO.: 81257/81255

E-FILE

D.C. Case: A-18-784704-W

Dept.: XII

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Sep 10 2020 12:07 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

MOTION FOR ENLARGEMENT OF TIME

COMES NOW Terrence M. Jackson, Esquire, the appointed appellate counsel, and moves this Honorable Court for an enlargement of time within which to file its Appellant’s Opening Brief and Appendix. This Motion is based on the following Memorandum and all papers and pleadings on file herein.

Dated this 10th day of September, 2020.

Respectfully submitted,

/s/ Terrence M. Jackson
TERRENCE M. JACKSON, ESQ.
Nevada Bar No. 000854
Terry.jackson.esq@gmail.com

Counsel for Appellant *Frederick H. Harris, Jr.*

MEMORANDUM

I, TERRENCE M. JACKSON, am a duly licensed attorney in the State of Nevada, and am a sole practitioner in the Law Office of Terrence M. Jackson. As grounds for this Motion, Defendant states because of the length of the appellate record and the complexity of issues involved, counsel requests additional time to complete the Opening Brief. The Appellant's Opening Brief and Appendix is currently due on September 29, 2020. This is a denial of a Post Conviction Petition in Eighth Judicial District Court following a jury verdict of guilt.

This Court may extend the time to file an Opening Brief upon a clear showing of good cause. As such, the Defendant requests an additional thirty day extension of time, up to and including October 28, 2020, within which to file the Opening Brief and voluminous Appendix under NRAP 31(b)(3).

This Motion is made in good faith and not for purposes of delay. Defendant is acting with due diligence in preparing the Opening Brief and has completed several drafts of the Opening Brief. With an additional thirty day extension Counsel will be able to file the Opening Brief and the voluminous Appendix.

DATED this 10th day of September, 2020.

//s// Terrence M. Jackson
TERRENCE M. JACKSON, ESQ.
Attorney of Record for Frederick H. Harris, Jr.

CERTIFICATE OF SERVICE

I hereby certify and affirm I am an assistant in the office of Terrence M. Jackson, Esquire, a person of such age and discretion as to be competent to serve papers and that on the 10th of September, 2020, I served this document, MOTION FOR ENLARGEMENT OF TIME, filed electronically with the Nevada Supreme Court, by electronic service (*eFlex*) as follows:

STEVEN B. WOLFSON
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And by U.S. Postal Service, first-class postage affixed to:

Frederick H. Harris, Jr.
ID# 1149356
Lovelock Correctional Center
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Lovelock, NV 89419

By: /s/ Ila C. Wills
Assistant to Terrence M. Jackson, Esq.