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**DISTRICT COURT
CLARK COUNTY, NEVADA**

JOSE DECASTRO,
Appellant,
vs.
STATE OF NEVADA,
Respondent.

CASE NO.: C-24-381730-A
23-CR-013015

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

COMES NOW, CHRISTOPHER R. ORAM, ESQ., attorney for appellant JOSE DECASTRO, and hereby moves this Honorable Court for its order enlarging the page limitation for the Opening Brief as specified in the Justice Court Rules of Civil Procedure 75 (B)(1).

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

DATED this 6th day of May 2024.

Respectfully submitted,

By: /s/ Christopher R. Oram
Christopher R. Oram, ESQ.
Nevada Bar No. 4349
520 S. Fourth Street, 2nd Floor
Las Vegas, Nevada, 89101
Attorney for Appellant

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 This Opening Brief the undersigned wishes to file comprises twenty-nine (29) pages of
3 text, nineteen (19) pages over the page limitation. Pursuant to Justice Court Rules of Civil
4 Procedure 75 (B)(1), the undersigned may ask for permission to exceed the page limitation of
5 the Opening Brief.

6 In support of this request, the undersigned notes that Mr. DeCastro's case raises
7 extensive constitutional issues that were not raised at trial or during pretrial proceedings. Mr.
8 DeCastro has numerous significant constitutional issues in his opening Brief, and it is necessary
9 that the undersigned file a twenty-nine (29) page Opening Brief to address the issues in full.

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**AFFIDAVIT IN SUPPORT OF APPELLANT’ MOTION TO ENLARGE PAGE LIMIT
OF APPELLANT’S OPENING BRIEF**

STATE OF NEVADA)
)ss:
COUNTY OF CLARK)

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

1. Affiant CHRISTOPHER R. ORAM, ESQ., is counsel for the Appellant, JOSE DECASTRO, in the above-entitled matter. I have personal knowledge of all matters contained herein and am competent to testify thereto.
2. The Opening Brief the undersigned wishes to file comprises of twenty-nine (29) pages of text, nineteen (19) pages over the page limitation. Pursuant to Justice Court Rules of Civil Procedure 75 (B)(1), the undersigned may ask for permission to exceed the page limitation of the Opening Brief. In support of this request, the undersigned notes that Mr. DeCastro’s case raises extensive constitutional issues that were not raised at trial or during pretrial proceedings. Mr. DeCastro has numerous significant constitutional issues in his opening Brief, and it is necessary that the undersigned file a twenty-nine (29) page Opening Brief to address the issues in full.
3. Affiant respectfully requests that this Honorable Court grant Appellant’s Motion to Enlarge Page Limitation of Appellant’s Opening Brief.

Dated this 6th day of May 2024.

_____/s/ Christopher R. Oram .
Christopher R. Oram, ESQ.
Nevada Bar No. 4349
520 S. Fourth Street, 2nd Floor
Las Vegas, Nevada, 89101
Attorney for Appellant

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 6th day of May 2024, I served a true and correct copy of the
3 foregoing document entitled **APPELLANT’S MOTION TO ENLARGE PAGE**
4 **LIMITATION OF APPELLANT’S OPENING BRIEF** to the Clark County District
5 Attorney’s Office and all other parties associated with this case by electronic mail as follows:

6
7 CLARK COUNTY DISTRICT ATTORNEY
8 motions@clarkcountyda.com
9 pdmotions@clarkcountyda.com

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11 By: /s/ Tyler G. Perry
12 An employee of Christopher R. Oram, Esq.
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