

IN THE SUPREME COURT OF THE STATE OF NEVADA

KEENAN WATKINS,
Appellant,

v.

THE STATE OF NEVADA,
Respondent.

Electronically Filed
Dec 17 2020 06:25 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

CASE NO: 79719

MOTION FOR ENLARGEMENT OF TIME

COMES NOW the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through his Chief Deputy, JONATHAN VANBOSKERCK, and moves this Court for an enlargement of time within which to file Respondent's Answering Brief. This motion is based on the following memorandum, declaration of counsel and all papers and pleadings on file herein.

Dated this 17th day of December, 2020.

Respectfully submitted,

STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565

BY /s/ Jonathan VanBoskerck
JONATHAN VANBOSKERCK
Chief Deputy District Attorney
Nevada Bar #006528
Office of the Clark County District Attorney

MEMORANDUM

I, JONATHAN VANBOSKERCK, am a duly licensed attorney in the State of Nevada and am employed by the Clark County District Attorney's Office. I am the supervising attorney in the above-captioned case.

Respondent's Answering Brief is currently due on Monday, December 21, 2020. The State is requesting a thirty (30) day extension of time in which to file its Answering Brief. NRAP 26(b) provides that this Court may enlarge the time for doing any act required by the Nevada Rules of Appellate Procedure upon good cause shown. This is the State's first request for an enlargement of time. If granted, the new filing date for Respondent's Answering Brief would be due on or before Wednesday, January 20, 2021.

Appellant filed his thirty-four (34) page Opening Brief, accompanied by a six (6) volume appendix, on November 19, 2020. Appellant is challenging his judgment of conviction resulting from a jury verdict after a five-day long trial. Appellant's Opening Brief contains multiple issues, including a challenge under the Confrontation Clause, a challenge to the sufficiency of the evidence supporting Appellant's convictions, as well as challenges to multiple district court orders regarding evidence and the scope of cross-examination. Considering the length and complexity of the legal issues in Appellant's Opening Brief, as well as the nature of the convictions against Appellant, including Robbery with Use of a Deadly Weapon,

Respondent will require more time to adequately prepare an Answering Brief. Appellant has received a sentence of twenty (20) to seventy-five (75) years, and Respondent is laboring to present this Court with a sufficient analysis of the fair trial Appellant received. Therefore, Respondent hereby makes this first request to extend time to allow additional time to review the appellate record and thoroughly brief Appellant's claims for this Court. This motion is made in good faith and not for the purpose of undue delay.

Dated this 17th day of December, 2020.

Respectfully submitted,

STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565

BY */s/ Jonathan VanBoskerck*

JONATHAN VANBOSKERCK
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CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on December 17, 2020. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

AARON D. FORD
Nevada Attorney General

JONATHAN VANBOSKERCK
Chief Deputy District Attorney

I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage pre-paid, addressed to:

T. AUGUSTUS CLAUS, ESQ.
Legal Resource Group, LLC.
205 N. Stephanie St., Suite D221
Henderson, Nevada 89074

BY /s/ E. Davis
Employee, District Attorney's Office

JV/Joshua Judd/ed