



1 **MEMORANDUM**

2 I, RYAN J. MACDONALD, am the supervising attorney in the above-  
3 captioned case. This Court may extend the time to file an Answer to Petition for  
4 Writ of Mandamus or Prohibition upon a showing of good cause. NRAP 26(b)(1).

5 The State's Answer on the instant matter is currently due on August 26,  
6 2012. This petition challenges the sufficiency of a 40-page Indictment in a  
7 complex, important, and constantly-evolving case. In order to adequately respond  
8 to petitioner's claims, the State requires more than the 20 days initially allotted.<sup>1</sup>

9 Due to the above-described circumstances, the State submits that good cause  
10 exists to extend the filing due date and respectfully requests this Court's  
11 permission for an extension of time of an additional TWENTY (20) days to file its  
12 Answer to Petition for Writ of Mandamus or Prohibition, making the Answer due  
13 to be filed on or before September 17, 2012. This motion is made in good faith  
14 and not for purposes of undue delay.

15 Dated this 21<sup>st</sup> day of August, 2012.

16 Respectfully submitted,

17 **STEVEN B. WOLFSON**  
18 Clark County District Attorney  
19 Nevada Bar #001565

20 BY */s/ Ryan J. MacDonald*

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22 Deputy District Attorney  
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<sup>1</sup>The State notes that Petitioner has filed a motion for emergency stay of district court proceedings in this Court on August 21, 2012. The State submits that because the trial date is October 22, 2012, a stay of district court proceedings is unnecessary at this time.

1 **CERTIFICATE OF SERVICE**

2 I hereby certify and affirm that this document was filed electronically with  
3 the Nevada Supreme Court on August 21, 2012. Electronic Service of the  
4 foregoing document shall be made in accordance with the Master Service List as  
5 follows:

6 CATHERINE CORTEZ MASTO  
7 Nevada Attorney General

8 MICHAEL V. CRISTALLI, ESQ.  
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10 Counsels for Appellant

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15 BY /s/ eileen davis  
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