

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

RONALD ERNEST LAKEMAN,

Appellant,

v.

THE STATE OF NEVADA,

Respondent.

Electronically Filed  
Nov 05 2014 01:37 p.m.  
Tracie K. Lindeman  
Clerk of Supreme Court

CASE NO: 64609

**MOTION FOR ENLARGEMENT OF TIME**

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

Dated this 5<sup>th</sup> day of November, 2014.

Respectfully submitted,

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

BY /s/ Ryan J. MacDonald  
RYAN J. MACDONALD  
Deputy District Attorney  
Nevada Bar #012615  
Office of the Clark County District Attorney

## **MEMORANDUM**

I, RYAN J. MACDONALD, am a duly licensed attorney in the State of Nevada and am employed by the Clark County District Attorney's Office.

Respondent's Answering Brief is currently due November 5, 2014. This is a direct appeal from the Judgment of Conviction. This Court may extend the time to file a Respondent's Answering Brief upon a clear showing of good cause. NRAP 31(b)(3).

The State requests thirty days up to and including December 4, 2014, within which to file Respondent's Answering Brief. On October 29, 2014, the State filed a Motion to Strike Appellant's Opening Brief and Appellant's Appendix. The State contends that the Appellant's Appendix does not include adequate transcripts with which to respond to Appellant's Opening Brief. As the Nevada Supreme Court has yet to rule on the State's Motion to Strike, the State hereby makes this first request to extend time as the State is unable to respond the Appellant's Opening brief given the Appendix provided. This motion is made in good faith and not for the purposes of undue delay.

I declare under penalty of perjury that the factual representations set forth in the foregoing memorandum are true and correct.

///

///

Dated this 5<sup>th</sup> day of November, 2014.

Respectfully submitted,

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

BY */s/ Ryan J. MacDonald*

---

RYAN J. MACDONALD  
Deputy District Attorney  
Nevada Bar #012615  
Office of the Clark County District Attorney  
Regional Justice Center  
200 Lewis Avenue  
P.O. Box 552212  
Las Vegas, NV 552212  
(702) 671-2500

## **CERTIFICATE OF SERVICE**

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on November 5, 2014. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

CATHERINE CORTEZ MASTO  
Nevada Attorney General

FREDERICK A. SANTACROCE, ESQ.  
Counsel for Appellant

RYAN J. MACDONALD  
Deputy District Attorney

BY /s/j. garcia  
Employee,  
Clark County District Attorney's Office

RJM/Genevieve Craggs/jg