

IN THE SUPREME COURT OF THE STATE OF NEVADA

RONALD ERNEST LAKEMAN,

Appellant,

v.

THE STATE OF NEVADA,

Respondent.

Electronically Filed
Dec 19 2014 08:19 a.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 18th day of December, 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 December 18, 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 January 20, 2015, within which to file Respondent's Answering Brief. On October 29, the State filed a Motion to Strike Appellant's Opening Brief and Appellant's Appendix. In response, Appellant filed a Motion for leave to file an amended appendix and opening brief. The Court granted Appellant's Motion. Appellant filed the Opening Brief with six separate issues on November 18, 2014. Moreover, Appellant included a 25-volume appendix consisting of 5,519 pages. Therefore, considering the length of the extensive appendix and the severity of the charges against Defendant, the State 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 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 18th day of December, 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 December 18, 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