

IN THE SUPREME COURT OF THE STATE OF NEVADA

DEANGELO R. CARROLL,
Appellant,

v.

THE STATE OF NEVADA,
Respondent.

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Tracie K. Lindeman
Clerk of Supreme Court

CASE NO: 64757

**MOTION FOR ENLARGEMENT OF TIME
(First Request)**

COMES NOW the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through his Chief Deputy, JONATHAN E. 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 5th day of January, 2015.

Respectfully submitted,

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

BY */s/ Jonathan E. VanBoskerck*

JONATHAN E. VANBOSKERCK
Chief Deputy District Attorney
Nevada Bar #006528
Office of the Clark County District Attorney
Regional Justice Center
200 Lewis Avenue
P.O. Box 552212
Las Vegas, Nevada 89155-2212

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.

Respondent's Answering Brief is currently due January 5, 2015. This is an appeal pursuant to NRAP 4(c), from a Judgment of Conviction on one count of Conspiracy to Commit Murder and one count of Murder. This Court may extend the time to file a Respondent's Answering Brief upon a showing of good cause. NRAP 31(b)(3).

The State requests thirty (30) days up to and including February 4, 2015, within which to file Respondent's Answering Brief. Appellant received five extensions of time, and an additional thirty (30) days due to this Court's leave to exceed the typeface limitations by five thousand (5000) words in his Opening Brief. Appellant ultimately filed his Opening Brief on December 4, 2014, along with a twelve-volume Appendix spanning nearly two thousand six-hundred (2600) pages. Appellant's Opening Brief raises six issues, many involving detailed factual and legal inquiries. Therefore, the State requests additional time to more thoroughly review the documents and accurately respond to Appellant's claims. Undersigned counsel apologizes to the Court and opposing counsel for this delay. This motion is made in good faith and not for 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 5th day of January, 2015.

Respectfully submitted,

STEVEN B. WOLFSON
Clark County District Attorney

BY */s/ Joanthan E. VanBoskerck*

JONATHAN E. VANBOSKERCK
Chief Deputy District Attorney
Nevada Bar #006528
Office of the Clark County District Attorney

CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on January 5, 2015. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

CATHERINE CORTEZ MASTO
Nevada Attorney General

MARIO D. VALENCIA, ESQ.
Counsel for Respondent

JONATHAN E. VANBOSKERCK
Chief Deputy District Attorney

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

JEV/Steven Rose /jg