

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

MICHAEL SCHOFIELD,  
Appellant,

v.

THE STATE OF NEVADA,  
Respondent.

Electronically Filed  
Jun 19 2015 11:33 a.m.  
Tracie K. Lindeman  
Clerk of Supreme Court

CASE NO: 65193

**MOTION FOR ENLARGEMENT OF TIME**

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 and all papers and pleadings on file herein.

Dated this 19<sup>th</sup> day of June, 2015.

Respectfully submitted,

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

BY /s/ Jonathan E. 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.

Respondent's Answering Brief is currently due June 19, 2015. This Court may extend the time to file a Respondent's Answering Brief upon a clear showing of good cause. NRAP 31(b)(3). As such the State requests 30 days, up to and including July 20, 2015, within which to file Respondent's Answering Brief.

This is an appeal from the district court's Judgment of Conviction. After a jury trial, Appellant was convicted of Child Abuse, Neglect or Endangerment and First Degree Kidnapping. After receiving two extensions of time, Appellant filed an Opening Brief. Among other things, Appellant challenges the sufficiency of the evidence presented at the six-day jury trial. Further, Appellant's remaining claims require research into the legislative intent behind Nevada's Kidnapping statute, in addition to a review of the kidnapping statutes from other jurisdictions. Therefore, the State hereby makes this second request to extend time to allow additional time to review the appellate record and thoroughly research and brief Appellant's claims for this Court. This motion is made in good faith and not for the purposes of undue delay.

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Dated this 19<sup>th</sup> day of June, 2015.

Respectfully submitted,

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

BY */s/ Jonathan E. 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 June 19, 2015. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

ADAM PAUL LAXALT  
Nevada Attorney General

KAREN K. WONG, ESQ.  
Counsel for Appellant

JONATHAN E. VANBOSKERCK  
Chief Deputy District Attorney

BY /s/ E.Davis

Employee,  
Clark County District Attorney's Office

JEV/Bryan Schwartz/ed