

IN THE SUPREME COURT OF THE STATE OF NEVADA

MATTHEW WASHINGTON,
Appellant,
v.
THE STATE OF NEVADA,
Respondent.

Electronically Filed
Jul 10 2015 02:49 p.m.
Tracie K. Lindeman
Clerk of Supreme Court
CASE NO: 65998

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 Respondent's Answering Brief. This motion is based on the following memorandum and all papers and pleadings on file herein.

Dated this 10th of July, 2015.

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. The State is requesting a 30 day extension of time in which to file Respondent's Answering Brief, pursuant to NRAP 31(b)(3).

This case is a direct appeal of Matthew Washington's convictions. On January 9, 2015, this Court granted Washington's Motion for Extension of Time. On February 19, 2015, Washington filed a second Motion for Extension of Time, which this Court granted in part on February 27, 2015. On April 21, 2015, Washington filed a third Motion to Extend Time to File Opening Brief, which this Court granted on April 24, 2015. On June 2, 2015, Washington filed his Opening Brief. On July 6, 2015, this Court granted the State's telephonic request for a five-day extension, making the State's Answering Brief due on July 10, 2015.

The State requests an additional 30 days to file Respondent's Answering Brief. Washington filed a 53-page Opening Brief and a ten-volume Appendix. Washington raises several issues that require extensive review of the record, which includes an eight-day jury trial and a penalty phase. Therefore, the State requests an additional 30 days to and including Monday, August 10, 2015, to more thoroughly research and address these issues. This Motion is made in good faith and not for purposes of undue delay.

Dated this 10th day of July, 2015.

Respectfully submitted,

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

BY */s/ Ryan J. MacDonald*

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CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on July 10, 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

SHARON G. DICKINSON
Deputy Public Defender

RYAN J. MACDONALD
Deputy District Attorney

BY /s/ E.Davis

Employee,
Clark County District Attorney's Office

RJM/Karen Mishler/ed