1 IN THE SUPREME COURT OF THE STATE OF NEVADA 2 3 THE STATE OF NEVADA, **Electronically Filed** 4 Mar 20 2015 11:38 a.m. Appellant, 5 Case Naracie K. Lindeman Clerk of Supreme Court 6 VS. 7 NATASHA JACKSON, 8 Respondent. 9 10 RESPONDENT'S MOTION FOR EXTENSION OF TIME 11 Comes Now Respondent, NATASHA JACKSON, by and through Deputy Public 12 Defender DAN A. SILVERSTEIN, and moves for a thirty (30) day extension of time from 13 14 Monday, March 16, 2015, through and including Wednesday, April 15, 2015, within which to 15 file Respondent's Answering Brief in this case. This Motion is based upon the attached 16 Declaration of counsel. 17 DATED this 20th day of March, 2015. 18 19 PHILIP J. KOHN CLARK COUNTY PUBLIC DEFENDER 20 21 22 /s/ Dan A. Silverstein, #7518 By DAN A. SILVERSTEIN, #7518 23 Deputy Public Defender 309 So. Third Street, Suite #226 24 Las Vegas, Nevada 89155-2610 25 (702) 455-4685 26 27 28

2 1. I am an attorney licensed to practice law in the State of Nevada; I am a deputy 3 public defender assigned to handle the appeal of this matter; I am familiar with the procedural 4 history of this case. 5 2. Our office received notification that the Opening Brief in this case was filed 6 by the Appellant on February 24, 2015. Appellate staff downloaded Respondent's copy and 7 8 forwarded it to respondent. 9 3. On March 2, 2015, respondent filed a Motion to Dismiss Based of Lack of 10 Jurisdiction. 11 On March 4, 2015, respondent filed a Notice to Withdraw The Motion to 12 Dismiss Appeal. 13 14 Appellate staff inadvertently removed the entry of the due date on 5. 15 Respondent's Answering brief when the motion to dismiss was withdrawn. This was an 16 oversight. 17 6. Declarant respectfully requests an extension of thirty days from the original 18 due date of March 16, 2015 within which to file Respondent's Answering brief. 19 20 7. This Motion for Extension is made in good faith and not for the purpose of 21 delay. 22 I declare under penalty of perjury that the foregoing is true and correct. 23 EXECUTED on the 20th day of March, 2015. 24 /s/ Dan A. Silverstein 25 DAN A. SILVERSTEIN 26 27

1

28

DECLARATION OF DAN A. SILVERSTEIN

CERTIFICATE OF SERVICE I hereby certify that this document was filed electronically with the Nevada Supreme Court on the 20th day of March, 2015.. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows: CATHERINE CORTEZ MASTO DAN A. SILVERSTEIN STEVEN S. OWENS HOWARD S. BROOKS I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage pre-paid, addressed to: NATASHA JACKSON c/o Florence McClure Womens Correctional Center 4370 Smiley Road Las Vegas, NV 89115 BY /s/ Carrie M. Connolly Employee, Clark County Public Defender's Office