## IN THE SUPREME COURT OF THE STATE OF NEVADA

THE STATE OF NEVADA,

> Appellant,
vs.
NATASHA JACKSON,
Respondent.

## RESPONDENT'S MOTION FOR EXTENSION OF TIME

Comes Now Respondent, NATASHA JACKSON, by and through Deputy Public
Defender DAN A. SILVERSTEIN, and moves for a thirty (30) day extension of time from Monday, March 16, 2015, through and including Wednesday, April 15, 2015, within which to file Respondent's Answering Brief in this case. This Motion is based upon the attached Declaration of counsel.

DATED this $20^{\text {th }}$ day of March, 2015.
PHILIP J. KOHN
CLARK COUNTY PUBLIC DEFENDER

By $\quad$ /s/ Dan A. Silverstein, \#7518
DAN A. SILVERSTEIN, \#7518
Deputy Public Defender
309 So. Third Street, Suite \#226
Las Vegas, Nevada 89155-2610
(702) 455-4685

## DECLARATION OF DAN A. SILVERSTEIN

1. I am an attorney licensed to practice law in the State of Nevada; I am a deputy public defender assigned to handle the appeal of this matter; I am familiar with the procedural history of this case.
2. Our office received notification that the Opening Brief in this case was filed by the Appellant on February 24, 2015. Appellate staff downloaded Respondent's copy and forwarded it to respondent.
3. On March 2, 2015, respondent filed a Motion to Dismiss Based of Lack of Jurisdiction.
4. On March 4, 2015, respondent filed a Notice to Withdraw The Motion to Dismiss Appeal.
5. Appellate staff inadvertently removed the entry of the due date on Respondent's Answering brief when the motion to dismiss was withdrawn. This was an oversight.
6. Declarant respectfully requests an extension of thirty days from the origina due date of March 16, 2015 within which to file Respondent's Answering brief.
7. This Motion for Extension is made in good faith and not for the purpose of delay.

I declare under penalty of perjury that the foregoing is true and correct.
EXECUTED on the $20^{\text {th }}$ day of March, 2015.
$\qquad$
/s/ Dan A. Silverstein
$\overline{\text { DAN A. SILVERSTEIN }}$

## CERTIFICATE OF SERVICE

I hereby certify that this document was filed electronically with the Nevada Supreme Court on the $20^{\text {th }}$ 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<br>/s/Carrie M. Connolly<br>Employee, Clark County Public<br>Defender's Office

