

IN THE SUPREME COURT OF THE STATE OF NEVADA

BENNETT GRIMES,
Appellant,

v.

THE STATE OF NEVADA,
Respondent.

Electronically Filed
Aug 21 2015 01:22 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

CASE NO: 67598

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

COMES NOW the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through his Deputy, CHRIS BURTON, and moves this Court for an enlargement of time within which to file Respondent's Fast Track Response. This motion is based on the following memorandum, declaration of counsel and all papers and pleadings on file herein.

Dated this 21st day of August, 2015.

Respectfully submitted,

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

BY /s/ Chris Burton
CHRIS BURTON
Deputy District Attorney
Nevada Bar #012940
Office of the Clark County District Attorney

MEMORANDUM

I, CHRISTOPHER BURTON, am a duly licensed attorney in the State of Nevada and am employed by the Clark County District Attorney's Office.

This is an appeal from the District Court's Judgment of Conviction. This Court may extend the time to file a response upon a showing of extreme need or merit. NRAP 3C(i)(2)(B). The State's response is currently due August 21, 2015.

The State requests a thirty day extension of time in which to file its Fast Track Response. The State's response will then be due on September 21, 2015. The State makes its second request of time for the following reasons. The law clerk that was previously assigned to this appeal has since been promoted to a deputy district attorney and the appeal has been reassigned. Appellant's Fast Track Statement contains 3,936 words and is accompanied by a 6-volume appendix. Additionally, Appellant's Fast Track Statement raises important constitutional questions. In order to adequately respond, the State requests additional time to fully review the record and research and brief the matter for this Court.

I declare under penalty of perjury that the factual representations set forth in the foregoing memorandum are true and correct.

///

///

///

Dated this 21st day of August, 2015.

Respectfully submitted,

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

BY */s/ Chris Burton*

CHRIS BURTON
Deputy District Attorney
Nevada Bar #012940
Office of the Clark County District Attorney
Regional Justice Center
200 Lewis Avenue
P.O. Box 552212
Las Vegas, NV 552212
(702) 671-2500

CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on August 21, 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

DEBORAH L. WESTBROOK
Deputy Public Defender

CHRIS BURTON
Deputy District Attorney

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

CFB//jg