

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

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STATE OF NEVADA,

Appellant,

v.

JANET SOLANDER,

Respondent.

Electronically Filed  
Aug 25 2015 03:24 p.m.  
Tracie K. Lindeman  
Clerk of Supreme Court  
CASE NO: 67711

**MOTION FOR ENLARGEMENT OF TIME**

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

Dated this 25<sup>th</sup> day of August, 2015.

Respectfully submitted,

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

BY */s/ Chris Burton*

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## MEMORANDUM

I, CHRIS BURTON, am the assigned attorney for the Appellant in the above-captioned case. This Court may extend the time to file any brief upon a showing of good cause. NRAP 26(b)(1)(A).

The State's Opening Brief on the instant matter is currently due on August 25, 2015. This is an appeal from the granting, in part, of a pre-trial Petition for Writ of Habeas Corpus. Based on the State's research to date, the issue is somewhat one of first impression in this State and requires significant analysis of statutory construction. Further, as the statute at issue is the law criminalizing sexual assault, the issue to be presented is one of state-wide importance. Not only does the issue require considerable legal research, but the record to date is already somewhat voluminous, including a five-day preliminary hearing transcript. The State therefore requires additional time to complete its Answer.

The State therefore submits good cause exists to extend the filing due date. The instant motion is the State's first request for an extension. Trial in this matter is currently scheduled for February 1, 2016.

Due to the above-described circumstances, Respondent respectfully requests this Court's permission for an extension of time of THIRTY (30) days to file its Opening Brief, making the Brief due to be filed on or before Thursday, September 24, 2015. This motion is made in good faith and not for purposes of undue delay.

Dated this 25<sup>th</sup> day of August, 2015.

Respectfully submitted,

**STEVEN B. WOLFSON**  
Clark County District Attorney

BY */s/ Chris Burton*

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## **CERTIFICATE OF SERVICE**

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on August 25, 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

KRISTINA WILDEVELD, ESQ.  
Counsel for Appellant

CHRIS BURTON  
Chief Deputy District Attorney

BY /s/ E.Davis  
Employee, District Attorney's Office

CB//ed