

IN THE SUPREME COURT OF THE STATE OF NEVADA

LUIS PIMENTEL,

Appellant,

v.

THE STATE OF NEVADA,

Respondent.

Electronically Filed
Apr 27 2016 08:50 a.m.
Tracie K. Lindeman
Clerk of Supreme Court

CASE NO: 68710

MOTION FOR ENLARGEMENT OF TIME (FIRST REQUEST)

COMES NOW the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through his Chief Deputy, JONATHAN E. VANBOSKERCK, 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 27th day of April, 2016.

Respectfully submitted,

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

BY /s/ Jonathan E. VanBoskerck
JONATHAN E. VANBOSKERCK
Chief Deputy District Attorney
Nevada Bar #006528
Office of the Clark County District Attorney

MEMORANDUM

I, JONATHAN E. VANBOSKERCK, 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 a Judgment of Conviction that was entered on August 7, 2015. This Court may extend the time to file a Respondent's Answering Brief upon a clear showing of good cause. NRAP 31(b)(3).

The State's Answering Brief is currently due on April 27, 2016, and no extensions of time have been requested by the State thus far. The State respectfully moves for an enlargement of time of 60 days, making said Answering Brief due on Monday, June 27, 2016. After receiving a 50-day extension, this Court granted Appellant's request for full briefing and gave Appellant an additional 60 days to file Appellant's Opening Brief. Subsequently, Appellant received another 14-day extension and then filed a 70-page Opening Brief, along with a 13-volume appendix consisting of approximately 3,167 pages. Appellant raises seven issues that require a thorough examination of the record, including a twelve-day jury trial. Therefore, the State hereby makes this first request to extend time to allow additional time to review the appellate record and thoroughly brief Appellant's claims for this Court. This motion is made in good faith and not for the purposes of undue delay.

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Dated this 27th day of April, 2016.

Respectfully submitted,

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

BY */s/ Jonathan E. VanBoskerck*

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CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on April 27, 2016. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

ADAM PAUL LAXALT
Nevada Attorney General

WILLIAM M. WATERS
Deputy Public Defender

JONATHAN E. VANBOSKERCK
Chief Deputy District Attorney

BY /s/ E.Davis

Employee,
Clark County District Attorney's Office

JEV/Vivian Luong/ed