

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

LACY L. THOMAS,

Petitioner,

vs,

THE EIGHTH JUDICIAL DISTRICT COURT  
OF THE STATE OF NEVADA, IN AND FOR  
THE COUNTY OF CLARK, AND THE  
HONORABLE MICHAEL VILLANI,  
DISTRICT JUDGE,

Respondent,

and

THE STATE OF NEVADA,

Real Party In Interest.

Electronically Filed  
Dec 02 2015 12:33 p.m.  
Tracie K. Lindeman  
Clerk of Supreme Court

CASE NO: 69074

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

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

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Dated this 2<sup>nd</sup> day of December, 2015.

Respectfully submitted,

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

BY /s/ Ofelia L. Monje  
Ofelia L. Monje  
Deputy District Attorney  
Nevada Bar #011663  
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200 Lewis Avenue  
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**MEMORANDUM**

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

The State's Answer on the instant matter is currently due on December 2, 2015. This is a Petition for Writ of Mandamus. The Petition is 25 pages and raises two complex issues. Respondent has read the Petition and the submitted 2 volume appendix, and also has familiarized herself with the extensive record in this case. Counsel is new to this case and becoming familiar with the facts was time-intensive. The State needs additional time to conduct additional research and fully respond to the issues presented to the Court.

The State submits good cause exists to extend the filing due date. Thomas did not file any extensions for his Petition and the instant motion is the State's first request for an extension. Additionally, trial is currently scheduled for February 8, 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 Answer, making the Brief due to be filed on or before Monday, January 4, 2015. This motion is made in good faith and not for purposes of undue delay.

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Dated this 2<sup>nd</sup> day of December, 2015.

Respectfully submitted,

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

BY */s/ Ofelia L. Monje*

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**CERTIFICATE OF SERVICE**

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on December 2, 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

FRANNY FORSMAN, ESQ.  
DANIEL J. ALBREGTS, ESQ.

OFELIA L. MONJE  
Deputy District Attorney

BY /s/ E.Davis

Employee,  
Clark County District Attorney's Office

OLM//ed