

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
Jan 04 2016 10:29 a.m.
Tracie K. Lindeman
Clerk of Supreme Court

CASE NO: 69074

**MOTION FOR ENLARGEMENT OF TIME
(Second 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 4th day of January, 2016.

Respectfully submitted,

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

BY /s/ Ofelia L. Monje
Ofelia L. Monje
Deputy District Attorney
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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 January 4, 2015. This is a Petition for Writ of Mandamus. The Petition is 25 pages and raises two complex issues. Respondent has largely prepared the State's Answer and corresponding Appendix, but needs additional time to do additional research. Also, the trial deputy on the case needs time to review the State's Answer and add any additional authority or argument that this Court might need.

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 second request for an extension, however, the State is only asking for a few days to complete its Answer.

Due to the above-described circumstances, Respondent respectfully requests this Court's permission for an extension of time of FIVE (5) days to file its Answer, making the Brief due to be filed on or before Monday, January 11, 2015. This motion is made in good faith and not for purposes of undue delay.

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Dated this 4th day of January, 2016.

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 January 4, 2016. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

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Nevada Attorney General

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BY /s/j. garica
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