

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

GENARO PERRY,  
Appellant,

v.

THE STATE OF NEVADA,  
Respondent.

Electronically Filed  
Jul 11 2016 09:06 a.m.  
Tracie K. Lindeman  
Clerk of Supreme Court

CASE NO: 69139

**MOTION FOR ENLARGEMENT OF TIME (FIRST REQUEST)**

COMES NOW the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through his Deputy, RYAN J. MACDONALD, 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 and all papers and pleadings on file herein.

Dated this 11<sup>th</sup> day of July 2016.

Respectfully submitted,

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

BY /s/ Ryan J. MacDonald  
RYAN J. MACDONALD  
Deputy District Attorney  
Nevada Bar #012615  
Office of the Clark County District Attorney

## **MEMORANDUM**

I, RYAN J. MACDONALD, 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 January 22, 2016. This Court may extend the time to file a Respondent's Fast Track Response upon a clear showing of good cause. NRAP 3C(i)(2).

The State's Fast Track Response is currently due on July 11, 2016, and no extensions of time have been requested by the State thus far. The State respectfully moves for an enlargement of time of 40 days, making said Fast Track Response due on Monday, August 22, 2016. After receiving a 90-day extension of time, Appellant filed a 19-page Fast Track Statement. Appellant raises three issues that require a thorough examination of the record, including a three-day bench trial. Appellant's Fast Track Statement is not a model of clarity and may require extensive reconstruction of its arguments for the State to respond. Further, the appellate unit will be transitioning law clerks in the upcoming month and the new law clerk will require more time to review the record. 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.

Dated this 11<sup>th</sup> day of July 2016.

Respectfully submitted,

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

BY */s/ Ryan J. MacDonald*

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## **CERTIFICATE OF SERVICE**

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on July 11, 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

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BY /s/ E.Davis

Employee,  
Clark County District Attorney's Office

RJM/Vivian Luong/ed