

IN THE SUPREME COURT OF THE STATE OF NEVADA

AMMAR HARRIS,
Appellant,

v.

THE STATE OF NEVADA,
Respondent.

Electronically Filed
Apr 24 2017 03:56 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

CASE NO: 69509

MOTION FOR ENLARGEMENT OF TIME (SECOND 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 Answering Brief. This motion is based on the following memorandum and all papers and pleadings on file herein.

Dated this 24th day of April, 2017.

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 the supervising attorney in the above-captioned case. This Court may extend the time to file an Answering Brief upon a showing of good cause. NRAP 31(b)(3)(D); SCR 250(6)(e).

The State's Answering Brief on the instant matter is currently due on April 24, 2017 following SIX extensions of time granted to the Appellant. This is a direct appeal from a Judgment of Conviction in a Death Penalty case. Appellant's opening brief is 42 pages and the Record on Appeal consists of 26 volumes. Not only are the issues presented numerous, complex and fact intensive, this is a capital case and the State's Answering Brief therefore requires additional time to complete. No further extensions are contemplated. The State therefore submits good cause exists to extend the filing due date. Appellant was granted SIX extensions of time to file his Opening Brief; this is the State's second request.

Due to the above-described circumstances, Respondent respectfully requests this Court's permission for an extension of time of SIXTY days to file its Answering Brief; making the Response due to be filed on or before June, 23, 2017. This motion is made in good faith and not for purposes of undue delay.

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Dated this 24th day of April, 2017.

Respectfully submitted,

STEVEN B. WOLFSON

Clark County District Attorney

BY */s/ Ryan J. MacDonald*

RYAN J. MACDONALD

Deputy District Attorney

Nevada Bar #012615

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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 24, 2017. 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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Deputy District Attorney

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

RJM//ed