

IN THE SUPREME COURT OF THE STATE OF NEVADA

AMMAR HARRIS,
Appellant,

v.

THE STATE OF NEVADA,
Respondent.

Electronically Filed
Jul 03 2017 11:30 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

CASE NO: 69509

MOTION FOR ENLARGEMENT OF TIME

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 3rd day of July, 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 June 3, 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. Additionally, staffing and other challenges (previously explained) have hindered the undersigned's progress in completing the brief; further review—by this deputy and the trial deputies—is required. Accordingly, the State's Answering Brief requires some additional time to complete. 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 fourth request.

Due to the above-described circumstances, Respondent respectfully requests this Court's permission for an extension of time of 10 days to file its Answering Brief; making the Response due to be filed on or before July 18, 2017. This motion is made in good faith and not for purposes of undue delay.

Dated this 3rd day of July, 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 July 3, 2017. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

ADAM PAUL LAXALT
Nevada Attorney General

DEBORAH L. WESTBROOK
Deputy Public Defender

RYAN J. MACDONALD
Deputy District Attorney

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

RJM//ed