

IN THE SUPREME COURT OF THE STATE OF NEVADA

GREGORY WILLIAMS,

Appellant,

v.

THE STATE OF NEVADA,

Respondent.

Electronically Filed
Mar 24 2017 02:05 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

CASE NO: 70868

MOTION FOR ENLARGEMENT OF TIME (FIRST REQUEST)

COMES NOW the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through his Chief Deputy, JONATHAN B. VANBOSKERCK, 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 March, 2017.

Respectfully submitted,

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

BY /s/ Jonathan E. VanBoskerck
JONATHAN E. VANBOSKERCK
Chief Deputy District Attorney
Nevada Bar #006528
Office of the Clark County District Attorney

MEMORANDUM

I, JONATHAN E. VANBOSKERCH, am a duly licensed attorney in the State of Nevada and am employed by the Clark County District Attorney's Office.

Respondent's Answering Brief is currently due March 24, 2017. This is an appeal from a Judgment of Conviction. This Court may extend the time to file an Answering Brief upon a showing of good cause. NRAP 31(b)(3).

The State herein makes its first request for an enlargement of time and requests thirty (30) days from March 24, 2017, within which to file Respondent's Answering Brief. If granted, the new filing date for the State's Answering Brief would be Monday, April 24, 2017.

Appellant submitted his Opening Brief on February 22, 2017, with a 6 volume appendix, spanning 1324 pages. Appellant's Opening Brief raises 10 discrete issues involving detailed factual and legal inquiries. On December 21, 2016, Appellant filed a Motion for Extension of Time, requesting a 60-day extension "[i]n light of the serious nature of the charges, the substantial sentence in this case, and the number of potential appellate issues that require additional research and exploration." This Court granted Appellant's Motion on December 28, 2016, extending the file date by 60 days. Therefore, the State also requests additional time to thoroughly review the record and accurately respond to Appellant's claims. This motion is made in good faith and not for purposes of undue delay.

Dated this 24th day of March, 2017.

Respectfully submitted,

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

BY */s/ Jonathan E. VanBoskerck*

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CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on March 24, 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

AUDREY CONWAY
Deputy Public Defender

JONATHAN E. VANBOSKERCK
Chief Deputy District Attorney

BY /s/ E.Davis

Employee,
Clark County District Attorney's Office

JEV/Alexander Vail/ed