

IN THE SUPREME COURT OF THE STATE OF NEVADA

TONY LEE HOBSON,
Appellant,

v.

THE STATE OF NEVADA,
Respondent.

Electronically Filed
May 26 2017 09:02 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

CASE NO: 71419

MOTION FOR ENLARGEMENT OF TIME

First Request

COMES NOW the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through his deputy, CHARLES W. THOMAN, 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, declaration of counsel and all papers and pleadings on file herein.

Dated this 26th day of May, 2017.

Respectfully submitted,

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

BY /s/ Charles W. Thoman
CHARLES W. THOMAN
Deputy District Attorney
Nevada Bar #012649
Office of the Clark County District Attorney

MEMORANDUM

I, CHARLES THOMAN, 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 May 26, 2017. This is an appeal from of a Judgment of Conviction including more than 80 felony convictions. This Court may extend the time to file a Respondent's Answering Brief upon a clear showing of good cause. NRAP 31(b)(3). As such, the State requests 60 days up to and including July 25, 2017, within which to file Respondent's Answering Brief.

The State herein makes its first request for an enlargement of time. If granted, the new filing date for the State's Respondent's Answering Brief would be July 25, 2016.

Appellant filed his initial Notice of Appeal on October 5, 2016. After receiving two extensions of time, he filed his Appellant's Opening Brief on April 26, 2017. Appellant's Opening Brief, which includes 20 volumes of appendices, raises issues requiring detailed factual and legal inquiries. Therefore, the State requests additional time to more thoroughly review the documents and accurately respond to Appellant's claims. This motion is made in good faith and not for purposes of undue delay.

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Dated this 26th day of May, 2017.

Respectfully submitted,

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

BY */s/ Charles W. Thoman*

CHARLES W. THOMAN
Deputy District Attorney
Nevada Bar # 012649
Office of the Clark County District Attorney
Regional Justice Center
200 Lewis Avenue
P.O. Box 552212
Las Vegas, NV 552212
(702) 671-2500

CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on May 26, 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

SANDRA L. STEWART, ESQ.
Counsel for Appellant

CHARLES THOMAN
Deputy District Attorney

BY /s/ J. Garcia
Employee,
Clark County District Attorney's Office

CWT/Melanie Scheible/jg