

IN THE SUPREME COURT OF THE STATE OF NEVADA

TONY LEE HOBSON,
Appellant,

v.

THE STATE OF NEVADA,
Respondent.

Electronically Filed
Jul 25 2017 02:59 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

CASE NO: 71419

MOTION FOR ENLARGEMENT OF TIME

Second 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 25th day of July, 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 July 25, 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 September 22, 2017, within which to file Respondent's Answering Brief.

The State herein makes its second request for an enlargement of time. If granted, the new filing date for the State's Respondent's Answering Brief would be September 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. The State has drafted its response and requires additional time to review the voluminous record with the Trial and Appellate Division attorneys. Therefore, the State requests additional time to complete its brief. This motion is made in good faith and not for purposes of undue delay.

Dated this 25th day of July, 2017.

Respectfully submitted,

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

BY */s/ Charles W. Thoman*

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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 25, 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