

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

ROBERT GUERRINA,  
Appellant,

v.

THE STATE OF NEVADA,  
Respondent.

Electronically Filed  
Jul 10 2017 02:16 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

CASE NO: 71444

**MOTION FOR ENLARGEMENT OF TIME  
(Second Request)**

COMES NOW the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through his Chief Deputy, KRISTA D. BARRIE, 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 10<sup>th</sup> day of July, 2017.

Respectfully submitted,

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

BY /s/ Krista D. Barrie  
KRISTA D. BARRIE  
Chief Deputy District Attorney  
Nevada Bar #010310  
Office of the Clark County District Attorney

## **MEMORANDUM**

I, KRISTA D. BARRIE, am a duly licensed attorney in the State of Nevada and am employed by the Clark County District Attorney's Office.

This is an appeal from a Judgment of Conviction that was entered on May 4, 2016. This Court may extend the time to file a Respondent's Answering Brief upon a clear showing of good cause. NRAP 31(b)(3).

The State's Answering Brief is currently due on July 10, 2017, and one extension of time has been requested by the State thus far. The State respectfully moves for an enlargement of time of 30 days, making said Answering Brief due on Wednesday, August 9, 2017. After receiving two extensions of time, Appellant filed his Opening Brief, along with a 5-volume appendix that includes a four-day jury trial. Appellant raises 5 issues, including multiple allegations of insufficiency of the evidence, requiring a thorough review of the record.

The State currently has a working draft; however, the draft is not complete and the trial and appellate attorneys will still need to review the draft. Therefore, the State hereby makes this second request to extend time to allow additional time to review the appellate record and thoroughly brief Appellant's claims for this Court. This motion is made in good faith and not for the purposes of undue delay.

I declare under penalty of perjury that the factual representations set forth in the foregoing memorandum are true and correct.

Dated this 10<sup>th</sup> day of July, 2017.

Respectfully submitted,

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

BY */s/ Krista D. Barrie*

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## **CERTIFICATE OF SERVICE**

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on 10<sup>th</sup> day of July, 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

KRISTA D. BARRIE  
Chief Deputy District Attorney

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

KDB/Nima Afshar/jg