

IN THE SUPREME COURT OF THE STATE OF NEVADA

SAYEDBASHE SAYEDZADA,

Appellant,

v.

THE STATE OF NEVADA,

Respondent.

Electronically Filed
Jun 13 2017 09:10 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

CASE NO: 71731

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 THOMAN, and moves this Court for an enlargement of time within which to file Respondent's Fast Track Response. This motion is based on the following memorandum and all papers and pleadings on file herein.

Dated this 13th day of June, 2017.

Respectfully submitted,

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

BY /s/ Charles Thoman
CHARLES 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 June 13, 2017. This is an appeal from a Judgment of Conviction. This Court may extend the time to file a Fast Track Response upon a showing of extreme need or merit. NRAP 3C(i)(2)(B).

The State herein makes its first request for an enlargement of time. The State requests thirty (30) days from June 13, 2017, within which to file Respondent's Fast Track Response. If granted, the new filing date for the Respondent's Fast Track Response would be July 13, 2017.

Appellant filed four Motions for Extension prior to filing his Fast Track Statement on May 24, 2017, with an accompanying appendix of nearly 800 pages. Appellant's Fast Track Statement raises five issues and several sub-issues, involving detailed factual and legal inquiries. Therefore, the State 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.

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Dated this 13th day of June, 2017.

Respectfully submitted,

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

BY */s/ Charles 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 June 13, 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

CHARLES THOMAN
Deputy District Attorney

BY /s/ E.Davis

Employee,
Clark County District Attorney's Office

CT/Gerard Gosioco/ed