

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

JORGE MENDOZA,  
Appellant,

v.

THE STATE OF NEVADA,  
Respondent.

Electronically Filed  
Jan 03 2018 02:01 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

CASE NO: 72056

**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, JONATHAN E. 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 3rd day of January 2018.

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. VANBOSKERCK, 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 December 2, 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 Wednesday, January 3, 2017. The State has been granted one prior extension. The State respectfully moves for a second enlargement of time of 15 days, making this brief due on January 18, 2018. The State needed time to get the transcript to respond to Appellant's arguments of bad faith. While the State has received the transcripts, the holiday schedule has made it difficult to complete the Answering Brief and send it to the trial attorney for review by the deadline. The State believes that the final product will be complete by January 18, 2018.

Therefore, the State hereby makes its second request to extend time to allow the Answering Brief to be reviewed. This motion is made in good faith and not for the purposes of undue delay.

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Dated this 3<sup>rd</sup> day of January, 2018.

Respectfully submitted,

STEVEN B. WOLFSON  
Clark County District Attorney  
Nevada Bar #006528

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 January 3, 2018. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

ADAM PAUL LAXALT  
Nevada Attorney General

AMANDA GREGORY, ESQ.  
Counsel for Appellant

JONATHAN E. VANBOSKERCK  
Chief Deputy District Attorney

BY /s/ E. Davis

Employee,  
Clark County District Attorney's Office

JEV/Raven Yim/ed