

IN THE SUPREME COURT OF THE STATE OF NEVADA

DONOVINE MATHEWS,

Appellant,

v.

THE STATE OF NEVADA,

Respondent.

Electronically Filed
Nov 20 2017 02:11 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

CASE NO: 72701

MOTION FOR ENLARGEMENT OF TIME

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 and all papers and pleadings on file herein.

Dated this 20th day of November, 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 W. THOMAN, am a duly licensed attorney in the State of Nevada and am employed by the Clark County District Attorney's Office. I am the supervising attorney in the above-captioned case. The Appellant's Opening Brief is currently due on November 20, 2017. The State is requesting a thirty (30) day extension of time in which to file its Answering Brief. NRAP 26(b) provides that this Court may enlarge the time for doing any act required by the Nevada Rules of Appellate Procedure upon good cause shown.

With respect to good cause, this is a Child Abuse, Neglect, Endangerment Case with a lengthy procedural history resulting from a jury trial. Appellant's Opening Brief raises seven (7) complex key issues spanning over sixty (60) pages that the State must address, and is accompanied by a seven (7) volume appendix. Therefore, the State respectfully requests additional time in order to thoroughly review the record and appropriately make its claims.

Due to the above-described circumstances, Appellant respectfully requests the Court's permission for an extension of time of thirty (30) days to file its Respondent's Answering Brief, making the State's response due to be filed on or before Wednesday, December 20, 2017. This motion is made in good faith and not for purposes of undue delay.

Dated this 20th day of November, 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 November 20, 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 W. THOMAN
Deputy District Attorney

BY /s/ E. Davis

Employee,
Clark County District Attorney's Office

CWT/Ashley Lacher/ed