

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

HELEN NATKO,  
Appellant,

v.

THE STATE OF NEVADA,  
Respondent.

Electronically Filed  
Jan 12 2018 02:53 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

CASE NO: 73048

**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 12<sup>th</sup> day of January, 2018..

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.

Respondent's Answering Brief is currently due January 16, 2018. This is an appeal from a Judgment of Conviction following a jury trial. This Court may extend time to file a Respondent's Answering Brief upon a showing of good cause. NRAP 31(b)(3).

The State herein makes its first request for an enlargement of time. The State requests sixty (60) additional days within which to file Respondent's Answering Brief. If granted, the new filing date for the State's Answering Brief would be March 19, 2018.

Appellant filed his Opening Brief on December 14, 2017. The State's Criminal Appeals Unit has reviewed Appellant's Opening Brief and the record, but requests additional time to thoroughly review the record, research the issues, accurately respond to Appellant's claims, and send the draft through the internal review process. Moreover, the Appeals Unit requests additional time to consult with the deputies who tried this case. With the holiday season coming to a close, many attorneys have been out of the office, are catching up on work, and are unable to review Respondent's Answering Brief in the current timeframe. This motion is made in good faith and not for purposes of undue delay.

Dated this 12<sup>th</sup> day of January, 2018.

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 January 12, 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

DANIEL T. FOLEY, ESQ.  
Counsel for Appellant

CHARLES W. THOMAN  
Deputy District Attorney

BY /s/ E. Davis

Employee,  
Clark County District Attorney's Office

CWT/Stephanie Getler/ed