

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

WILLIAM WITTER,  
Appellant,

v.

THE STATE OF NEVADA,  
Respondent.

Electronically Filed  
May 07 2020 07:48 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

CASE NO: 73431

**MOTION FOR ENLARGEMENT OF TIME**

COMES NOW the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through his Chief Deputy District Attorney, TALEEN PANDUKHT, 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 7<sup>th</sup> day of May, 2020.

Respectfully submitted,

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

BY /s/ Taleen Pandukht  
TALEEN PANDUKHT  
Chief Deputy District Attorney  
Nevada Bar #005734  
Office of the Clark County District Attorney

## **MEMORANDUM**

I, TALEEN PANDUKHT, 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 May 7, 2020. This is an appeal from the denial of Appellant's Fourth Petition for Writ of Habeas Corpus, which was denied over three (3) years ago in April 2017. 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 to include July 6, 2020, within which to file Respondent's Answering Brief. The State's Criminal Appeals Unit has reviewed the extensive district court record and requires more time to fully prepare the Answering Brief due to the nature of Appellant's claims, the extensive transcripts from Appellant's four (4) Petitions for Writ of Habeas Corpus and this Court's ruling on Appellant's direct appeal as well as his previous three (3) appeals on each of his prior petitions. The numerous issues of law and preparation of a Respondent's Appendix require more time to adequately brief and prepare sufficient arguments for. Appellant has had substantial time to identify and brief numerous issues in the instant appeal. Appellant's Fourth Petition was denied over three (3) years ago and Appellant has requested a nearly eighteen (18) month stay of his appeal as well as two (2) extensions to file his Opening Brief. Respondent respectfully requests

additional time to prepare and file a thorough and accurate response to all of Appellant's claims in the extensive Opening Brief. If granted, the new filing date for the State's Answering Brief would be July 6, 2020. 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 7<sup>th</sup> day of May, 2020.

Respectfully submitted,

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

BY */s/ Taleen Pandukht*

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TALEEN PANDUKHT  
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## **CERTIFICATE OF SERVICE**

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on May 7, 2020. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

AARON D. FORD  
Nevada Attorney General

DAVID ANTHONY  
STACY NEWMAN  
Assistant Federal Public Defenders

TALEEN PANDUKHT  
Chief Deputy District Attorney

BY /s/ E. Davis

Employee,  
Clark County District Attorney's Office

TP/Skyler Sullivan/ed