

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

GARY LAMAR CHAMBERS,  
Appellant,

v.

THE STATE OF NEVADA,  
Respondent.

Electronically Filed  
Sep 20 2018 02:37 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

CASE NO: 73446

**MOTION FOR ENLARGEMENT OF TIME**

COMES NOW the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through his Deputy, KRISTA D. BARRIE, 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 20<sup>th</sup> day of September, 2018.

Respectfully submitted,

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

BY /s/ Krista D. Barrie  
KRISTA D. BARRIE  
Chief Deputy District Attorney  
Nevada Bar #010310  
Office of the Clark County District Attorney

## **MEMORANDUM**

I, KRISTA D. BARRIE, 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 September 20, 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 November 19, 2018.

Appellant filed his Opening Brief on August 21, 2018. The Opening Brief is 54 pages long, with a 14 volume appendix. 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. Additionally, the State's Criminal Appeals Unit is undergoing its annual transition between law clerks and is presently understaffed.

Therefore, the State hereby makes this first request to allow additional time to review the appellate record and thoroughly brief Appellant's claims for this Court.

This motion is made in good faith and not for the purposes of undue delay.

Dated this 20<sup>th</sup> day of September, 2018.

Respectfully submitted,

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

BY */s/ Krista D. Barrie*

---

KRISTA D. BARRIE  
Chief Deputy District Attorney  
Nevada Bar #010310  
Office of the Clark County District Attorney  
Regional Justice Center  
200 Lewis Avenue  
Post Office Box 552212  
Las Vegas, Nevada 89155  
(702) 671-2750

## **CERTIFICATE OF SERVICE**

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on September 20, 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

JEAN J. SCHWARTZER, ESQ.  
Counsel for Appellant

KRISTA D. BARRIE  
Chief Deputy District Attorney

BY /s/ E. Davis

Employee,  
Clark County District Attorney's Office

KDB/Mariya Malkova/ed