

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

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THOMAS WILLIAM RANDOLPH,

Appellant,

v.

THE STATE OF NEVADA,

Respondent.

Electronically Filed  
Feb 19 2019 02:56 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

CASE NO: 73825

**MOTION FOR ENLARGEMENT OF TIME**

Comes Now the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through his Chief 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 19<sup>th</sup> day of February, 2019.

Respectfully submitted,

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

BY /s/ Charles W. Thoman  
CHARLES W. THOMAN  
Chief 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. Respondent's Answering Brief is currently due on Tuesday, February 19, 2019. The State is requesting a 60-day extension of time in which to file its Answering Brief. SCR 250(7)(d) and NRAP 31(b)(3)(D) provide that this Court may enlarge the time upon showing of good cause.

This is the State's first request for an enlargement of time. If granted, the new filing date for Respondent's Answering Brief would be due on or before Monday, April 22, 2019.

Appellant filed his Opening Brief on December 18, 2018. Appellant's Opening Brief raises 8 issues and contains 40 volumes of appendixes. This is an appeal from a jury verdict of guilty. The issues in Appellant's Opening Brief require a thorough examination of the trial record and related case law.

Due to the above-described circumstances, Respondent respectfully requests the Court's permission for an extension of time of 60 days to file its Opening Brief, making the State's response due to be filed on or before April 19, 2019. This is Respondent's first Motion for Enlargement of Time, and this motion is made in good faith and not for purposes of undue delay.

Dated this 19<sup>th</sup> day of February, 2019.

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 February 19, 2019. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

AARON D. FORD  
Nevada Attorney General

SANDRA L. STEWART, ESQ.  
Counsel for Appellant

CHARLES W. THOMAN  
Chief Deputy District Attorney

BY /s/ E. Davis

Employee,  
Clark County District Attorney's Office

CWT/Yu Meng/Joshua Prince/ed