

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

CHRISTOPHER ROBERT KELLER,

Appellant,

v.

THE STATE OF NEVADA,

Respondent.

Electronically Filed  
Mar 14 2018 03:18 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

CASE NO: 73871

**MOTION FOR ENLARGEMENT OF TIME**

**Second Request**

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, declaration of counsel and all papers and pleadings on file herein.

Dated this 12<sup>th</sup> day of March, 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 # 12649  
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 March 14, 2018. The State is requesting a thirty-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.

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 April 13, 2018.

Appellant's Opening Brief was filed on January 11, 2018, and raises three complex issues requiring detailed factual and legal inquiries. The law clerk to whom the Answering Brief was assigned was absent for a week in order to take the Bar Exam and was unable to work on this brief. Although the State now has a preliminary draft, additional time is needed to thoroughly brief the claims for this Court. This motion is made in good faith and not for the purposes of undue delay.

Due to the above-described circumstances, Respondent respectfully requests the Court's permission for an extension of time of thirty (30) days to file its Answering Brief, making the State's response due to be filed on or before Friday, April 13, 2018.

Dated this 12<sup>th</sup> day of March, 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 March 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

KENNETH G. FRIZZELL, ESQ.  
Counsel for Appellant

CHARLES W. THOMAN  
Deputy District Attorney

BY /s/ J. Garcia  
Employee,  
Clark County District Attorney's Office

CWT/Melanie Marland/jg