

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

KEANDRE VALENTINE,  
Appellant,

v.

THE STATE OF NEVADA,  
Respondent.

Electronically Filed  
Sep 07 2018 11:56 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

CASE NO: 74468

**MOTION FOR ENLARGEMENT OF TIME**

COMES NOW the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through his Chief Deputy, KRISTA D. BARRIE, and moves this Court for an enlargement of time within which to file the State's Answering Brief. This motion is based on the following memorandum and all papers and pleadings on file herein.

Dated this 7<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 7, 2018. This is a direct appeal from the Judgment of Conviction. This Court may extend the time to file a Respondent's Answering Brief upon a clear showing of good cause. NRAP 31(b)(3).

The State requests sixty days up to and including November 6, 2018, within which to file Respondent's Answering Brief. Appellant filed an Opening Brief with sixty-four pages and ten separate and complex issues, which include numerous sub issues. Additionally, Appellant included a 15-volume appendix consisting of 3,229 pages. Therefore, considering the length of the Opening Brief, and extensive appendix, the State hereby makes this first request to extend time 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.

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Dated this 7<sup>th</sup> day of September, 2018.

Respectfully submitted,

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

BY */s/ Krista D. Barrie*

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**CERTIFICATE OF SERVICE**

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on September 7, 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

SHARON G. DICKINSON  
Deputy Public Defender

KRISTA D. BARRIE  
Chief Deputy District Attorney

BY */s/ E. Davis*

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Employee,  
Clark County District Attorney's Office

KDB/Mariya Malkova/ed