

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

THE STATE OF NEVADA,  
Appellant,

v.

RIGOBERTO INZUNZA,  
Respondent.

Electronically Filed  
Aug 23 2018 03:54 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

CASE NO: 75662

**MOTION FOR ENLARGEMENT OF TIME**

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

Dated this 23<sup>rd</sup> day of August, 2018.

Respectfully submitted,

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

BY /s/ Jonathan E. VanBoskerck  
JONATHAN E. VANBOSKERCK  
Chief Deputy District Attorney  
Nevada Bar #006528  
Office of the Clark County District Attorney

## **MEMORANDUM**

I, JONATHAN VANBOSKERCK, am a duly licensed attorney in the State of Nevada and am employed by the Clark County District Attorney's Office.

Appellant's Brief is currently due August 23, 2018. The State is requesting a thirty-day extension of time in which to file its Opening 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.

The State's Criminal Appeals Unit has reviewed the record but requests additional time to thoroughly research the issues, and send the draft through the internal review process. Moreover, the State requires additional time to consult with the trial deputy assigned to this case.

The State herein makes its first request for an enlargement of time. The State requests thirty (30) additional days to include September 24, 2018, within which to file Appellant's Opening Brief. If granted, the new filing date for the State's Answering Brief would be September 24, 2018. 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 23<sup>rd</sup> day of August, 2018.

Respectfully submitted,

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

BY */s/ Jonathan E. VanBoskerck*

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## **CERTIFICATE OF SERVICE**

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on August 23, 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

P. DAVID WESTBROOK  
Deputy Public Defender

JONATHAN E. VANBOSKERCK  
Chief Deputy District Attorney

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

JEV/Ann Dunn/jg