

IN THE SUPREME COURT OF THE STATE OF NEVADA

JANET SOLANDER,
Appellant,

v.

THE STATE OF NEVADA,
Respondent.

Electronically Filed
May 17 2019 08:23 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

CASE NO: 76228

MOTION FOR ENLARGEMENT OF TIME

COMES NOW the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through his Chief Deputy, JONATHAN E. VANBOSKERCK, 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 17th day of May, 2019.

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 E. VANBOSKERCK, 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 May 17, 2019. This is an appeal from a conviction following a jury trial which lasted nearly three weeks. 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 thirty (30) additional days to include June 17, 2019, within which to file Respondent's Answering Brief. If granted, the new filing date for the State's Answering Brief would be June 17, 2019.

Appellant filed her sixty-one (61) page Opening Brief along with a twenty-two (22) volume appendix on April 17, 2019. The Opening Brief raises thirteen (13) complicated main issues and a claim of cumulative error that require a thorough examination of the several-thousand-page record and of related case law. Therefore, 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.

I declare under penalty of perjury that the factual representations set forth in the foregoing memorandum are true and correct.

Dated this 17th day of May, 2019.

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
Regional Justice Center
200 Lewis Avenue
P.O. Box 552212
Las Vegas, NV 552212
(702) 671-2500

CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on May 17, 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

CAITLYN MCAMIS, ESQ.
KRISTINA WILDEVELD, ESQ.
Counsel for Appellant

JONATHAN E. VANBOSKERCK
Chief Deputy District Attorney

BY /s/ E. Davis

Employee,
Clark County District Attorney's Office

JEV/Joshua Prince/ed