

IN THE SUPREME COURT OF THE STATE OF NEVADA

BRANDON STARR,
Appellant,

v.

THE STATE OF NEVADA,
Respondent.

Electronically Filed
Jul 27 2017 03:28 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

CASE NO: 71401

MOTION FOR ENLARGEMENT OF TIME

COMES NOW the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through his Deputy, CHARLES 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 27th day of July, 2017.

Respectfully submitted,

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

BY /s/ Charles Thoman
CHARLES THOMAN
Deputy District Attorney
Nevada Bar #012649
Office of the Clark County District Attorney

MEMORANDUM

I, CHARLES THOMAN, 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 July 21, 2017. This is an appeal from of a Judgment of Conviction including more than 80 felony convictions. This Court may extend the time to file a Respondent's Answering Brief upon a clear showing of good cause. NRAP 31(b)(3). As such, the State requests 90 days up to and including October 19, 2017, within which to file Respondent's Answering Brief.

The State herein makes its first request for an enlargement of time. If granted, the new filing date for the State's Respondent's Answering Brief would be October 19, 2018.

Appellant filed his initial Notice of Appeal on October 3, 2016. After receiving two extensions of time, he filed his Appellant's Opening Brief on June 21, 2017. Appellant's Opening Brief, which includes 12 volumes of appendices, raises issues requiring detailed factual and legal inquiries. Therefore, the State requests additional time to more thoroughly review the documents and accurately respond to Appellant's claims.

Also the paralegal assigned to filing this extension motion thought she had timely filed it on July 21, 2017. However on review the error of the non-filed motion was discovered and is being remedied now with apologies to the Court.

This motion is made in good faith and not for purposes of undue delay.

Dated this 27th day of July, 2017.

Respectfully submitted,

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

BY */s/ Charles Thoman*

CHARLES THOMAN
Deputy District Attorney
Nevada Bar #12649
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 July 27, 2017. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

ADAM PAUL LAXALT
Nevada Attorney General

TERRENCE M. JACKSON, ESQ.
Counsel for Appellant

CHARLES THOMAN
Deputy District Attorney

BY /s/ E. Davis
Employee,
Clark County District Attorney's Office

CT/Melanie Scheible/ed