

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

ANTHONY BARR,  
Appellant,

v.

THE STATE OF NEVADA,  
Respondent.

CASE NO:

Electronically Filed  
Dec 06 2019 08:47 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**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 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 6<sup>th</sup> day of December, 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 VANBOSKERCK, 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 Friday December 6, 2019. The State requests a sixty-day (60) extension of time in which to file its Answering Brief. NRAP 31(b)(3).

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 due on or before Thursday, February 6, 2020.

Appellant filed his Opening Brief on November 6, 2019. Appellant's Opening Brief raises eight issues and eight appendices spanning over seventeen hundred pages. The issues raised by Appellant require a thorough examination of the record and related case law. The law clerk responsible for the instant appeal needs more time to become familiar with the record and law regarding the numerous issues raised in Appellant's Opening Brief.

Due to the above-described circumstances, Respondent respectfully requests the Court's permission for an extension of time of sixty (60) days to file its Opening Brief, making the State's response due to be filed on or before Tuesday, February 4, 2020. This is Respondent's first Motion for Enlargement of Time, and this motion is made in good faith and not for purposes of undue delay.

Dated this 6<sup>th</sup> day of December, 2019.

Respectfully submitted,

**STEVEN B. WOLFSON**  
Clark County District Attorney

BY */s/ Jonathan E. VanBoskerck*

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**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 December 6, 2019. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

ARRON D. FORD  
Nevada Attorney General

JEANNIE N. HUA, ESQ.  
Counsel for Appellant

JONATHAN E. VANBOSKERCK  
Chief Deputy District Attorney

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

JEV(JTN)/Julia Barker/jg