

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

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CHRISTOPHER SENA,  
Appellant,

v.

THE STATE OF NEVADA,  
Respondent.

Electronically Filed  
Jun 19 2020 07:47 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

CASE NO: 79036

**MOTION FOR ENLARGEMENT OF TIME**

COMES NOW the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through his Chief Deputy, ALEXANDER CHEN, 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 19<sup>th</sup> day of June 2020.

Respectfully submitted,

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

BY /s/ Alexander Chen  
ALEXANDER CHEN  
Chief Deputy District Attorney  
Nevada Bar #010539  
Office of the Clark County District Attorney

## MEMORANDUM

I, ALEXANDER CHEN, 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, June 19, 2020. 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 Tuesday, August 18, 2020.

Appellant filed his Opening Brief on May 20, 2020. Appellant's Opening Brief raises five (5) issues and includes twenty-eight (28) appendices spanning over six thousand (6,000) 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 for each issue.

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 Answering Brief, making the State's response due to be filed on or before Tuesday, August 18, 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 19<sup>th</sup> day of June, 2020.

Respectfully submitted,

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

BY */s/ Alexander Chen*  
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ALEXANDER CHEN  
Chief Deputy District Attorney  
Nevada Bar #010539  
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**CERTIFICATE OF SERVICE**

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on June 19, 2020. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

AARON D. FORD  
Nevada Attorney General

WILLIAM M. WATERS  
Chief Deputy Public Defender

ALEXANDER CHEN  
Chief Deputy District Attorney

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