

IN THE SUPREME COURT OF THE STATE OF NEVADA

CRAIG THOMAS TIFFEE,

Appellant,

v.

EIGHTH JUDICIAL DISTRICT
COURT,

Respondent,

and

THE STATE OF NEVADA,

Real Party in Interest.

Electronically Filed
Jun 25 2020 08:20 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

CASE NO: 79871

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 25th day of June, 2020.

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. I am the supervising attorney in the above-captioned case. Respondent's Answering Brief is currently due on Thursday, June 25, 2020. The State requests a thirty-day (30) 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 Monday, July 27, 2020.

Appellant filed his Opening Brief on April 2, 2020. Appellant's Opening Brief raises one issue and the issue raised by Appellant requires a thorough examination of the record and related case law. The issue also requires an examination of relevant case law outside of this jurisdiction. Additionally, per the Order from this Court on May 19, 2020, Appellant's appendix did not include a certificate of service nor did the certificate of service attached to the Opening Brief comply with NRAP 25(d). This Court informed Appellant that he had seven (7) days to file proof of service, but Appellant has not complied and Respondent was unsure as to the impact of those failures on the briefing schedule.

Due to the above-described circumstances, Respondent respectfully requests the Court's permission for an extension of time of thirty (30) days to file its

Answering Brief, making the State's response due to be filed on or before Monday, July 27, 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 25th day of June, 2020.

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 June 25, 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

THOMAS C. MICHAELIDES, ESQ.
Counsel for Appellant

JONATHAN E. VANBOSKERCK
Chief Deputy District Attorney

BY /s/ E. Davis

Employee,
Clark County District Attorney's Office

JEV/Seleste Wyse/ed