

IN THE SUPREME COURT OF THE STATE OF NEVADA

RONNEKA ANN GUIDRY,
Appellant,
v.
THE STATE OF NEVADA,
Respondent.

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Apr 22 2021 06:44 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

CASE NO:

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 22nd day of April, 2021.

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.

This is a direct appeal from a Judgment of Conviction. This Court may extend the time to file an Opening Brief upon a clear showing of good cause. NRAP 31(b)(3).

Prior to the filing of Appellant's Opening Brief, Appellant filed five (5) extension requests. The Court granted three (3) of these requests because Appellant filed her Opening Brief before the Court could rule on her subsequent two (2) requests. The State's Answering Brief is currently due on April 22, 2021. This is the State's first request for an enlargement of time. The State respectfully moves for an enlargement of time of thirty (60) days, making this brief due on June 21, 2021.

On March 9, 2018, Appellant was charged by way of Indictment with one (1) count of Murder with Use of A Deadly Weapon (Category A Felony – NRS 200.010, 200.030, 193.165), one (1) count of Robbery with Use of A Deadly Weapon (Category B Felony – NRS 200.380, 193.165), one count of Grand Larceny (Category B Felony – NRS 205.220.1, 205.222.3), and one (1) count of Duty to Stop at Scene of Crash Involving Death or Personal Injury (Category B Felony – NRS 484E.010). After six (6) days of trial, the jury found Appellant

guilty of the following: Count 1 – Second Degree Murder, Count 2 – Robbery, Count 3 – Grand Larceny with an amount greater than \$3,500. Count 4 – Duty to Stop At A Scene of Crash Involving Death or Personal Injury. Appellant was adjudicated guilty and received an aggregate total sentence of life with a minimum parole eligibility of eighteen (18) years.

In her eighty-five (85) page Opening Brief, Appellant has raised eleven (11) issues plus several sub-issues based on the six (6) day trial. Due to the severity of Appellant's sentence, the complexity of the legal issues raised, the time needed to thoroughly review the record as well as research the issues to adequately respond to Appellant's claims, the State is requesting an extension to assist this Court in the resolution of the matter.

Therefore, the State hereby makes its first request to extend time to allow the Answering Brief to be reviewed. 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.

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Dated this 22nd day of April, 2021.

Respectfully submitted,

STEVEN B. WOLFSON
Clark County District Attorney

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 April 22, 2021. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

ARRON D. FORD
Nevada Attorney General

SHARON G. DICKINSON
Chief Deputy Public Defender

JONATHAN E. VANBOSKERCK
Chief Deputy District Attorney

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

JEV/Brittini Griffith/jg