

IN THE SUPREME COURT OF THE STATE OF NEVADA

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

CASE NO: Electronically Filed
Jun 18 2021 09:05 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 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 18th day of June, 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 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 June 21, 2021. The State requests a thirty-day (30) extension of time in which to file its Answering Brief. NRAP 26(b) provides that this Court may enlarge the time for doing any act required by the Nevada Rules of Appellate Procedure upon good cause shown.

This is the State's second request for an enlargement of time. If granted, the new filing date for Respondent's Answering Brief would be due on July 21, 2021. Appellant filed her Opening Brief on March 23, 2021, after filing five (5) requests for extensions which allowed Appellant, from the time of her notice of appearance, nearly six months to file her Opening Brief. Should this Court grant the State's request, the State would still have approximately half the amount of time it took Appellant to file an Answering Brief.

Appellant's Opening Brief raises twenty-seven issues (this includes Appellant's sub-issues) and ten appendices. Within those twenty-six (26) issues, Appellant has challenged nearly every phase of Appellant's case, including issues regarding: several jury instructions, sufficiency of the evidence for Appellant's convictions, double jeopardy, voir dire, prosecutorial misconduct during the

opening as well as closing arguments, the admission of a “gruesome” photo, the State’s witness Detective Salisbury, unreasonable search and seizure regarding the several warrants executed prior to trial, cumulative error, and a sentencing error.

Appellant was sentenced eighteen (18) years to life for four (4) different crimes, including second-degree murder. Moreover, Appellant filed a Motion for leave to File an Opening Brief in Excess of the Type-Volume Limitation which was granted. Given the severity of Appellant’s sentence and the seriousness of Appellant’s crimes, a thorough and complete Answering brief necessitates thirty additional days to review the record, related case law, and properly brief the issues for this Court. Moreover, once the law clerk assigned to respond to this brief has completed a draft, the brief must complete the office’s internal review process.

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 July 21, 2021. This motion is made in good faith and not for 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 18th day of June, 2021.

Respectfully submitted,

STEVEN B. WOLFSON
Clark County District Attorney

BY */s/ Jonathan E. VanBoskerck*

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 18, 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/Brittni Griffith/jg