

IN THE SUPREME COURT OF THE STATE OF NEVADA

ARMANDO VASQUEZ-REYES,

Appellant,

v.

THE STATE OF NEVADA,

Respondent.

Electronically Filed
Sep 28 2020 07:57 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

CASE NO: 80293

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 28th day of September, 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 Monday, September 28, 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 Monday, November 30, 2020.

Appellant filed his Opening Brief on August 27, 2020. Appellant's Opening Brief raises nine issues and contains eleven volumes of appendices. The issues raised by Appellant require an extensive and thorough examination of the record. Further, there needs to be a thorough examination of related case law.

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 Monday, November 30, 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.

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Dated this 28th day of September, 2020.

Respectfully submitted,

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

BY */s/ Alexander Chen*

ALEXANDER CHEN
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CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on September 28, 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

AUDREY M. CONWAY
Chief Deputy Public Defender

ALEXANDER CHEN
Chief Deputy District Attorney

BY /s/ E. Davis

Employee,
Clark County District Attorney's Office

AC/Seleste Wyse/ed