

IN THE SUPREME COURT OF THE STATE OF NEVADA

KODY HARLAN,
Appellant,
v.
THE STATE OF NEVADA,
Respondent.

CASE NO: Electronically Filed
Apr 16 2021 11:12 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, TALEEN PANDUKHT, 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 16th day of April, 2021.

Respectfully submitted,

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

BY /s/ Taleen Pandukht

TALEEN PANDUKHT
Chief Deputy District Attorney
Nevada Bar #005734
Office of the Clark County District Attorney

MEMORANDUM

I, TALEEN PANDUKHT, 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 April 16, 2021. 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, June 15, 2021.

Appellant filed his Opening Brief on March 17, 2021, after receiving seven (7) extensions of time to file the opening brief. 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 Opening Brief, making the State's response due to be filed on or before Tuesday, June 15, 2021. 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 16th day of April, 2021.

Respectfully submitted,

STEVEN B. WOLFSON
Clark County District Attorney

BY */s/ Taleen Pandukht*

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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 16, 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

JEAN J. SCHWARTZER, ESQ.
Counsel for Appellant

TALEEN PANDUKHT
Chief Deputy District Attorney

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

TP/Julia Barker/jg