

IN THE SUPREME COURT OF THE STATE OF NEVADA

DEQUINCY BRASS,
Appellant,

v.

THE STATE OF NEVADA,
Respondent.

CASE NO:

Electronically Filed
Feb 25 2021 03:46 p.m.
Elizabeth A. Brown
Clerk of Supreme Court
81142

MOTION FOR ENLARGEMENT OF TIME (FIRST REQUEST)

COMES NOW the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through his Deputy, JOHN NIMAN, 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 February, 2021.

Respectfully submitted,

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

BY */s/ John T. Niman*

JOHN T. NIMAN
Deputy District Attorney
Nevada Bar #014408
Office of the Clark County District Attorney
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200 Lewis Avenue
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Las Vegas, Nevada 89155-2212
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MEMORANDUM

I, JOHN NIMAN, 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 March 1, 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 Friday, April 30, 2021.

Appellant filed his Opening Brief on January 26, 2021. Appellant's Opening Brief raises twelve issues and nine appendices. The issues raised by Appellant require a thorough examination of the record and related case law. Appellant was further permitted to file an Opening Brief in excess of the word limit and responding to that many issues takes additional time. 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 Friday,

April 30, 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.

Dated this 25th day of February, 2021.

Respectfully submitted,

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

BY */s/ John T. Niman*

JOHN T. NIMAN
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CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on 25th day of February, 2021. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

AARON D. FORD
Nevada Attorney General

DEBORAH L. WESTBROOK
Chief Deputy Public Defender

JOHN T. NIMAN
Deputy District Attorney

/s/ J. Garcia

Employee, Clark County
District Attorney's Office

JTN/Julia Barker/jg