

IN THE SUPREME COURT OF THE STATE OF NEVADA

SAMUEL HOWARD,
Appellant,

v.

THE STATE OF NEVADA,
Respondent.

Electronically Filed
Jul 27 2020 08:18 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

CASE NO: 81278
81279

MOTION FOR ENLARGEMENT OF TIME (FIRST REQUEST)

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 27th day of July, 2020.

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 an appeal from an Order Denying Petition for Writ of Habeas Corpus (Post-Conviction) in a capital case. This Court may extend the time to file a Respondent's Answering Brief upon a clear showing of good cause. SCR 250(7)(d), NRAP 31(b)(3)(d).

The State's Answering Brief is currently due on July 27, 2020. This is the State's first request for an enlargement of time. The State respectfully moves for an enlargement of time of thirty (30) days, making this brief due on August 26, 2020. Due to this being a capital case, the State is requesting this extension to thoroughly research and brief Appellant's claims for this Court.

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.

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Dated this 27th day of July 2020.

Respectfully submitted,

STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #006528

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 July 27, 2020. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

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BY /s/ E. Davis

Employee,
Clark County District Attorney's Office

JEV/Brittini Griffith/ed