

IN THE SUPREME COURT OF THE STATE OF NEVADA

THE STATE OF NEVADA,

Appellant,

v.

VINNIE ADAMS,

Respondent.

CASE NO:

Electronically Filed
Jan 12 2021 07:28 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, ALEXANDER CHEN, and moves this Court for an enlargement of time within which to file State's Opening Brief. This motion is based on the following memorandum, declaration of counsel and all papers and pleadings on file herein.

Dated this 12th day of January, 2021.

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.

This is a direct appeal from an Order of Dismissal. This Court may extend the time to file an Opening Brief upon a clear showing of good cause. NRAP 31(b)(3).

The State's Opening Brief is currently due on January 12, 2021. This is the State's first request for an enlargement of time. The State respectfully moves for an enlargement of time of sixty (60) days, making this brief due on March 15, 2021. Due to the legal issue raised being both a matter of first impression and statewide importance, the State is requesting this extension to continue its review of the record, to research the issue, and to thoroughly brief the matter for this Court.

Therefore, the State hereby makes its first request to extend time to allow the Opening Brief to be reviewed. This motion is made in good faith and not for the 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 12th day of January, 2021.

Respectfully submitted,

STEVEN B. WOLFSON
Clark County District Attorney

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 January 12, 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

CLAUDIA L. ROMNEY
Deputy Public Defender

ALEXANDER CHEN
Chief Deputy District Attorney

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

AC/Brittini Griffith/jg