

IN THE SUPREME COURT OF THE STATE OF NEVADA

ASHLEY BENNETT,
Appellant,

v.

THE STATE OF NEVADA,
Respondent.

CASE NO:

Electronically Filed
Jul 15 2021 07:11 a.m.
Elizabeth A. Brown
Clerk of Supreme Court
82495

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 15th day of July, 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. I am the supervising attorney in the above-captioned case. Respondent's Answering Brief is currently due on Thursday, July 15, 2021. The State requests a thirty-day (30) extension of time in which to file its Answering Brief. NRAP 26(b) provides that this Court may enlarge the time for doing any act required by the Nevada Rules of Appellate Procedure upon good cause shown.

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, August 16, 2021.

Appellant filed his Opening Brief on June 15, 2021. Due to staffing issues at the Clark County District Attorney's Office, this appeal needed to be re-assigned from the original law clerk who was most familiar with the facts of this appeal. This office is continuing to operate short-staffed, however, if given thirty additional days it will ensure that a response is filed.

This motion is made in good faith and not for 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 15th day of July, 2021.

Respectfully submitted,

STEVEN B. WOLFSON
Clark County District Attorney

BY */s/ 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 July 15, 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

NEIL A. KAPLAN, ESQ.
KATHERINE E. PEPIN, ESQ.
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D. LOREN WASHBURN, ESQ.
Counsel for Appellant

ALEXANDER CHEN
Chief Deputy District Attorney

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

AC//jg