

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

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SHELBE RIVERA

Appellant,

v.

THE STATE OF NEVADA,

Respondent.

Electronically Filed  
Oct 13 2021 07:03 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

CASE NO: 82918

**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 and all papers and pleadings on file herein.

Dated this 13th day of October 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 Wednesday, October 13, 2021. The State requests a sixty-day (60) 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. Appellant filed his Opening Brief on September 13, 2021. The State's Appellate Unit is currently understaffed and undergoing its annual transition between law clerks and the time will be needed to familiarize the new assigned law clerk with the case so they can adequately review the record and research the issues to submit a thorough and accurate brief for this Court's review. Respondent respectfully requests additional time to adequately prepare and file an adequate response to Appellant's Opening Brief. If granted, the new filing date for the State's Answering Brief would be on December 13, 2021. This motion is made in good faith and not for the purposes of undue delay.

Dated this 13th day of October, 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  
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## **CERTIFICATE OF SERVICE**

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on October 13, 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

JESS R. MARCHESE, ESQ.  
Counsel for Appellant

ALEXANDER CHEN  
Chief Deputy District Attorney

BY /s/ E. Davis

Employee,  
Clark County District Attorney's Office

AC/Elan Eldar/ed