

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

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ZANE FLOYD,  
Appellant,  
v.  
THE STATE OF NEVADA,  
Respondent.

CASE NO: Electronically Filed  
Jan 27 2022 11:21 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 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 27<sup>th</sup> day of January, 2022.

Respectfully submitted,

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

BY */s/ Alexander Chen*

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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 attorney responsible for drafting this brief. Respondent's Answering Brief is currently due on January 27, 2022. The State requests a thirty (30) 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 Monday, February 28, 2022.

Appellant filed his Opening Brief on December 28, 2021. Respondent has completed much of the brief, however, due to managerial duties, shortages with staffing issues, and emergency pleadings that required a more timely response, Respondent was unable to complete the Answering Brief.

Due to the above-described circumstances, Respondent respectfully requests the Court's permission for an extension of time of thirty (30) days to file its Opening Brief, making the State's response due to be filed on Monday, February 28, 2022.

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.

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Dated this 27<sup>th</sup> day of January, 2022.

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 January 27, 2022. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

ARRON D. FORD  
Nevada Attorney General

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ALEXANDER CHEN  
Chief Deputy District Attorney

BY /s/ J. Hall  
Clark County District Attorney's Office

AC/jh