

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

---

BARRY HARRIS,  
Appellant,  
v.  
THE STATE OF NEVADA,  
Respondent.

CASE NO: Electronically Filed  
May 18 2022 10:16 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, 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 18<sup>th</sup> day of May, 2022.

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 VANBOSKERCK, 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 May 18, 2022. The State requests a thirty-day (30) extension of time in which to file its Answering Brief. This Court may extend time to file a Respondent's Answering Brief upon a showing of good cause. NRAP 31(b)(3).

The State herein makes its first request for an enlargement of time. The State requests thirty (30) days within which to file Respondent's Answering Brief. This is an appeal from a denial of Petition for Writ of Habeas Corpus (Post-Conviction). Appellant has had substantial time to identify and brief the issues in the instant appeal. On February 28, 2022, Appellant requested an extension, which was granted on March 1, 2022, giving Appellant until April 18, 2022, to file his Opening Brief. Appellant filed his Opening Brief on April 18, 2022. The law clerk responsible for the instant appeal needs more time to adequately review the record and research the issues to submit a thorough and accurate answering brief for this Court's review. Due to the above-described circumstances, Respondent respectfully requests the Court's permission for an extension of time of thirty (30) days. If granted, the new filing date for the State's Answering Brief would be on June 17, 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.

Dated this 18<sup>th</sup> day of May, 2022.

Respectfully submitted,

**STEVEN B. WOLFSON**  
Clark County District Attorney

BY */s/ Jonathan E. VanBoskerck*

---

**JONATHAN E. VANBOSKERCK**  
Chief Deputy District Attorney  
Nevada Bar #006528  
Office of the Clark County District Attorney  
Regional Justice Center  
200 Lewis Avenue  
P.O. Box 552212  
Las Vegas, Nevada 89155-2212  
(702) 671-2500

## **CERTIFICATE OF SERVICE**

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on May 18, 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

DUSTIN R. MARCELLO, ESQ.  
Counsel for Appellant

JONATHAN E. VANBOSKERCK  
Chief Deputy District Attorney

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

JEV/Samantha Goett/jh