IN THE SUPREME COURT OF THE STATE OF NEVADA

JAMES ROBERT BONETTI, Petitioner, vs.	Electronically Filed Jun 06 2022 07:55 p.m. Elizabeth A. Brown Clerk of Supreme Court
	Supreme Court Case No. 83634
THE FIFTH JUDICIAL COURT OF THE	District Court Case No. CR9595
STATE OF NEVADA, IN AND FOR THE	
COUNTY OF NYE; AND THE	
HONORABLE KIMBERLY A. WANKER	
DISTRICT JUDGE,	
Respondent,	
AND THE STATE OF NEVADA,	
Real Party in Interest.	

MOTION FOR ENLARGEMENT OF TIME

COMES NOW, Petitioner James Robert Bonetti, by and through his

counsel, Ronni N. Boskovich, Esq., and submits a Motion for Enlargement of

Time to file Petitioner's Reply to Respondent's Answer to Petitioner's Writ

of Mandamus or Alternatively, Writ of Prohibition. This Motion is based on

the following memoranda and all papers and pleadings on file herein.

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DATED this 6th day of June, 2022.

Boskovich Law Group, PLLC

By: /s/Ronni N. Boskovich, Esq.

RONNI N. BOSKOVICH Bar No 14484 Attorney for Petitioner 3190 S. Highway 160, Suite H Pahrump, Nevada 89048

<u>MEMORANDUM</u>

I, RONNI N. BOSKOVICH, ESQ, am a duly licensed attorney in the State of Nevada, and I am the attorney of record for Petitioner James Robert Bonetti in the above-entitled case.

Petitioner Bonetti filed his Petition for Writ of Mandamus/Prohibition on October 15, 2021. Respondent District Court Judge Kimberly Wanker filed her Answer to Mr. Bonetti's Petition on May 2, 2022. Although not required, Petitioner Bonetti will be filing a brief Reply with this Court.

Petitioner's Reply is currently due on June 6, 2022. Petitioner herein makes his first written request for an enlargement of time of fourteen (14) days to June 20, 2022, within which to file his Reply and any additional supporting documentation. This Court may extend the time to file the Reply upon a clear showing of good cause.

Petitioner's writ arises from a case dating back to 2018, with thousands of pages of documental review required to thoroughly understand the issues that are contained within this matter.

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Additionally, Counsel needs additional time to review these pleadings with Petitioner Bonetti. Although not required, Petitioner wants the opportunity to file a Reply and address Respondent's Answer appropriately. Petitioner Bonetti is out of custody; therefore, he will not suffer any prejudice by the Court granting this extension. This Motion is made in good faith and not for the purpose of delay.

An additional fourteen (14) days would be ample time to finalize the Reply and ensure that all points are thoroughly addressed.

Therefore, I respectfully request this Court to grant the Motion for Enlargement of Time.

DATED this 6th day of June, 2022.

Respectfully submitted,

BOSKOVICH LAW GROUP, PLLC

By: <u>/s/ Ronni N. Boskovich, Esq.</u> RONNI N. BOSKOVICH, ESQ. Attorney for Petitioner 3190 S. Highway 160, Suite H Pahrump, Nevada 89048 (702) 583-4041

CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on the 6th day of June, 2022. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

CHRIS ARABIA Nye County District Attorney 1520 E. Basin Ave., #107 Pahrump, Nevada 89060

AARON FORD Nevada Attorney General

I further certify and affirm that a true and correct copy of this document

will be hand delivered to:

HONORABLE KIMBERLY WANKER Fifth Judicial District Court 1520 E. Basin Ave. #105 Pahrump, Nevada 89060

> By: <u>/s/ Ronni N. Boskovich, Esq.</u> BOSKOVICH LAW GROUP, PLLC