

IN THE SUPREME COURT OF THE STATE OF NEVADA

CHRISTOPHER ADAM TRUSCA,

Appellant,

v.

THE STATE OF NEVADA,

Respondent.

Electronically Filed
Apr 21 2022 09:49 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

CASE NO: 83853
c/w 84183

MOTION FOR ENLARGEMENT OF TIME

COMES NOW the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through his Deputy, JOHN AFSHAR, 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 21st day of April 2022.

Respectfully submitted,

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

BY */s/ John Afshar*

JOHN AFSHAR
Deputy District Attorney
Nevada Bar #014408
Office of the Clark County District Attorney

MEMORANDUM

I, JOHN AFSHAR, 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 April 22, 2022. The State requests a thirty-one day (31) 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-one (31) days within which to file Respondent's Answering Brief. This is an Appeal from the Judgment of Conviction following a guilty plea (83853) consolidated with an appeal from the denial of a post-conviction motion to modify sentence (84183). Appellant filed his Opening Brief on March 23, 2022. The issues raised by Appellant require a thorough examination of the record and related case law, and our response requires review by the negotiating deputy. 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 circumstance, Respondent respectfully requests the Court's permission for an extension of time of thirty-one (31) days. If granted, the new filing date for the State's Answering Brief would be on Monday, May 23,

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 21st day of April, 2022.

Respectfully submitted,

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

BY */s/ John Afshar*

JOHN AFSHAR
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CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on April 21, 2022. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

AARON D. FORD
Nevada Attorney General

JAMIE J. RESCH, ESQ.
Counsel for Appellant

JOHN AFSHAR
Deputy District Attorney

BY /s/ E. Davis

Employee,
Clark County District Attorney's Office

JA//ed