

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

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SHAN JONATHON KITTREDGE,

Appellant,

v.

THE STATE OF NEVADA,

Respondent.

CASE NO:

Electronically Filed  
May 26 2022 05:32 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 26<sup>th</sup> day of May, 2022.

Respectfully submitted,

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

BY */s/ Jonathan E. VanBoskerck*

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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 on Friday, May 27, 2022. The State is requesting a thirty (30) day 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).

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 or before Monday, June 27, 2022. Appellant filed his Opening Brief on April 27, 2022. Appellant is challenging a denial of a Post-Conviction Writ of Habeas Corpus. Appellant's Opening Brief contains multiple issues, including a challenge to the district court's handling of Appellant's competency. Considering the length and complexity of the legal issues in Appellant's Opening Brief, as well as the nature of the convictions against Appellant, Respondent will require more time to adequately prepare an Answering Brief. 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 27, 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.

I declare under penalty of perjury that the factual representations as set forth in the foregoing memorandum are true and correct.

Dated this 26<sup>th</sup> day of May, 2022.

Respectfully submitted,

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

BY */s/ Jonathan E. VanBoskerck*

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**CERTIFICATE OF SERVICE**

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on 26<sup>th</sup> day of May, 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

TERRENCE M. JACKSON, ESQ.  
Counsel for Appellant

JONATHAN E. VANBOSKERCK  
Chief Deputy District Attorney

*/s/ J. Hall*

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Employee, Clark County  
District Attorney's Office

JV/Elizabeth Turner/jh