

IN THE SUPREME COURT OF THE STATE OF NEVADA

THE STATE OF NEVADA,

Petitioner,

v.

THE EIGHTH JUDICIAL DISTRICT
COURT OF THE STATE OF
NEVADA, IN AND FOR THE
COUNTY OF CLARK, AND THE
HONORABLE TIERRA JONES,
DISTRICT JUDGE

Respondent,

and

JOHN EUGENE DOANE,

Real Party in Interest.

Electronically Filed
Apr 19 2022 05:52 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

CASE NO: 84134

MOTION FOR ENLARGEMENT OF TIME

COMES NOW the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through his Chief Deputy, TALEEN PANDUKHT, and moves this Court for an enlargement of time within which to file Petitioner's Reply Brief. This Motion is based on the following memorandum, declaration of counsel and all papers and pleadings on file herein.

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Dated this 19th day of April 2022.

Respectfully submitted,

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

BY /s/ Taleen Pandukht
TALEEN PANDUKHT
Chief Deputy District Attorney
Nevada Bar #005734
Office of the Clark County District Attorney

MEMORANDUM

I, TALEEN PANDUKHT, 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. Petitioner's Reply Brief is currently due April 19, 2022. The State requests a thirty-day (30) extension of time in which to file its Reply Brief. This Court may extend time to file a Petitioner's Reply 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 Petitioner's Reply Brief. This is a Petition for Writ of Mandamus or Prohibition from Denial of State's Motion to Reconsider State's Motion to Admit Evidence of Other Crimes (Pre-trial). The State filed its Petition for Writ of Mandamus and/or Prohibition on January 26, 2022. On March 3, 2022, Real Party in Interest, John Doane ("Doane"), filed a Motion for Extension of Time requesting an additional thirty-two (32) days to respond. On March 8, 2022, the Court filed an Order granting Doane's Motion, and the deadline for filing Doane's Answering Brief was rescheduled to April 5, 2022.

Doane was granted an extension and the State needs more time to respond to additional arguments raised in his Answering Brief. 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 reply brief for this Court's review. The

State would also note that it requires additional time in order to ensure that its Reply Brief, once drafted, is able to be reviewed by the attorneys who are conducting the underlying trial. Due to the above-described circumstances, Petitioner 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 May 19, 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 19th day of April 2022.

Respectfully submitted,

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

BY */s/ Taleen Pandukht*

TALEEN PANDUKHT
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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 19, 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

DAVID E. LOPEZ-NEGRETE
Deputy Public Defender

TALEEN PANDUKHT
Chief Deputy District Attorney

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

TP/Megan Thompson/jh