

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

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JEMAR MATTHEWS

Appellant,

v.

THE STATE OF NEVADA,

Respondent.

Electronically Filed  
Aug 11 2022 02:09 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

CASE NO: 84339

**MOTION FOR ENLARGEMENT OF TIME**

COMES NOW the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through his Chief Deputy, ALEXANDER CHEN, 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 11<sup>th</sup> day of August 2022.

Respectfully submitted,

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

BY /s/ Alexander Chen  
ALEXANDER CHEN  
Chief Deputy District Attorney  
Nevada Bar #010539  
Office of the Clark County District Attorney

## **MEMORANDUM**

I, ALEXANDER CHEN, am a duly licensed attorney in the State of Nevada and am employed by the Clark County District Attorney's Office. I am the attorney handling the above-captioned case. Respondent's Answering Brief is currently due on Friday, August 12, 2022. The State requests a thirty-day (30) extension of time in which to file its Answering Brief. NRAP 26(b) provides that this Court may enlarge the time for doing any act required by the Nevada Rules of Appellate Procedure upon good cause shown.

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, September 12, 2022.

Appellant filed his Opening Brief on July 13, 2022. Due to staffing issues at the Clark County District Attorney's Office, and the unavailability of two law clerks within the past month, this brief was not able to be completed within the allotted time. Respondent has examined the issues raised by Appellant and is confident that a response can be finalized within the next 30 days. Respondent also wants to give trial counsel an opportunity to review the brief prior to filing.

This motion is made in good faith and not for purposes of undue delay.

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

Dated this 11<sup>th</sup> day of August, 2022.

Respectfully submitted,

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

BY /s/ Alexander Chen  
ALEXANDER CHEN  
Chief Deputy District Attorney  
Nevada Bar #010539  
Office of the Clark County District Attorney  
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## **CERTIFICATE OF SERVICE**

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on August 11, 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

TODD M. LEVENTHAL, ESQ.  
Counsel for Appellant

ALEXANDER CHEN  
Chief deputy District Attorney

BY /s/ E. Davis

Employee,  
Clark County District Attorney's Office

AC//ed