

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

KIM BLANDINO,  
Appellant,  
v.  
THE STATE OF NEVADA,  
Respondent.

Electronically Filed  
Apr 25 2023 09:46 AM  
Elizabeth A. Brown  
Clerk of Supreme Court  
CASE NO: 84433

**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 25<sup>th</sup> day of April, 2023.

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 response in the above-captioned case. Respondent's Answering Brief is due on April 25, 2023. 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 Thursday, May 25, 2023.

This brief is close to being completed but because of some unforeseen matters that required immediate attention, this brief was not completed. Although the trial itself was not lengthy, the procedural history of this case is incredibly arduous and relevant to the arguments made in Appellant's Opening Brief. Thus, a grant of additional time would allow Respondent to complete this brief.

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.

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Dated this 25<sup>th</sup> day of April, 2023.

Respectfully submitted,

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

BY */s/ Alexander Chen*

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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 25, 2023. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

ARRON D. FORD  
Nevada Attorney General

JOSEPH Z. GERSTEN, ESQ.  
Counsel for Appellant

ALEXANDER CHEN  
Chief Deputy District Attorney

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

AC//jh