

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

ISIAH TAYLOR

Appellant,

v.

THE STATE OF NEVADA,

Respondent.

Electronically Filed  
Feb 28 2022 11:16 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

CASE NO: 83709

**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 28<sup>th</sup> day of February 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 supervising attorney in the above-captioned case. Respondent's Answering Brief is currently due on Monday, February 28, 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 Wednesday, March 30, 2022.

Appellant filed his Opening Brief on January 27, 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. However, the staffing of the office now is back to normal for the appellate division. If granted, the State is sure that this brief will be completed within the next thirty days.

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

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Dated 28<sup>th</sup> day of February, 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  
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## **CERTIFICATE OF SERVICE**

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on February 28, 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

MONIQUE MCNEILL, ESQ.  
Counsel for Appellant

ALEXANDER CHEN  
Chief Deputy District Attorney

BY /s/ E. Davis

Employee,  
Clark County District Attorney's Office

AC//ed