

1 IN THE SUPREME COURT OF THE STATE OF NEVADA

2 JESSE D. NOBLE, JR.,

Supreme Court No.: 85803

3 Appellant,

4 v.

5 THE STATE OF NEVADA,

6 Respondent.

MOTION FOR EXTENSION OF
TIME TO FILE RESPONSE
ANSWERING BRIEF
REQUEST
Electronically Filed
APR 10 2023 11:07 PM
Elizabeth A. Brown
Clerk of Supreme Court

7 Respondent moves this Court, pursuant to NRAP 26(b)(1)(B) and NRAP 31(b)(3),
8 for a 1-day enlargement of time from the current due date, up to and including August 11,
9 2023, within which to file its Answering Brief. The Answering Brief was originally due
10 on July 27, 2023. This is the second enlargement of time sought by Respondent in this
11 matter, as Respondent previously received the two-week telephonic extension.
12 Respondent brings this motion in good faith and not for the purpose of delay.

13 The Nevada Rules of Appellate Procedure permit this Court to extend deadlines for
14 good cause. NRAP 26(b)(1)(A). Undersigned counsel represents that she is still currently
15 dealing with an on-going medical crisis for her father, which for the past nearly two weeks
16 has required an unanticipated excessive amount of time and energy assisting with medical
17 decisions and out-of-state medical care as well as arranging interstate medical
18 transportation. Undersigned counsel has been diligently striving to resolve and/or work
19 around these issues and made every effort to finish the Answering Brief within the two-
20 week extended timeframe, but these issues have impacted the ability to fully complete the
21 Answering Brief in a timely fashion, thus necessitating an additional one-day extension.

1 As a result, Respondent seeks a brief further extension of time in which to file the
2 Answering Brief in order to adequately present the merits of this case to this Court. *See*,
3 *e.g.*, *Price v. Dunn*, 106 Nev. 100, 105, 787 P.2d 785, 787 (1990) (noting this Court's
4 preference for deciding cases on the merits). Out of an abundance of caution, undersigned
5 counsel respectfully requests a one-day extension of time until August 11, 2023, to finalize
6 and submit the Answering Brief.

7 DATED this 10th day of August, 2023.

8 AARON D. FORD
9 Attorney General

10 By: /s/ Jaimie Stilz
11 JAIMIE STILZ
12 Bar No. 13772
13 Senior Deputy Attorney General
14 Office of the Nevada Attorney General
15 555 E. Washington Ave., Ste. 3900
16 Las Vegas, Nevada 89101
17
18
19
20
21

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21

Participants in the case who are registered with this Court's electronic filing system will receive notice that the document has been filed and is available on the court's electronic filing system.

/s/ J. Stilz
An employee of the Office of the Attorney General