1	IN THE SUPREME COURT OF THE STATE OF NEVADA			
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3	KEITH MATHAHS,			
4	Petitioner,		Electronically Filed Aug 21 2012 03:13 p.m.	
5 6	vs.		Tracie K. Lindeman Clerk of Supreme Court	
7	THE EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF			
8	NEVADA IN AND FOR THE	CASE NO:	61359	
9	COUNTY OF CLARK, AND THE HONORABLE VALERIE ADAIR, DISTRICT JUDGE	D.C. NO:	C2654107	
10	Respondent,			
11	and			
12	THE STATE OF NEVADA,			
13	Real Party in Interest.			
14	MOTION FOR ENLARGEMENT OF TIME			
15	COMES NOW the State of Nevada, by STEVEN B. WOLFSON, Clark			
16	County District Attorney, through his Deputy, RYAN J. MACDONALD, and			
17	moves this Court for an enlargement of time within which to file Answer to			
18	Petition for Writ of Mandamus or Prohibition. This motion is based on the			
19	following memorandum, declaration of counsel and all papers and pleadings on			
20	file herein.			
21	Dated this 21 st day of August, 2012.			
22	Respectfully submitted,			
23	STEVEN B. WOLFSON Clark County District Attorney Nevada Bar #001565			
24	Nevada B	Bar #001565	ey	
25				
26		Ryan J. MacDonald		
27	RYAN J. MACDONALD Deputy District Attorney Nevada Bar #12615			
28	Offi	ice of the Clark Cou	unty District Attorney	
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	Docket 61359 Document 2012-26324			

MEMORANDUM

I, RYAN J. MACDONALD, am the supervising attorney in the abovecaptioned case. This Court may extend the time to file an Answer to Petition for Writ of Mandamus or Prohibition upon a showing of good cause. NRAP 26(b)(1).

The State's Answer on the instant matter is currently due on August 26, 2012. This petition challenges the sufficiency of a 40-page Indictment in a complex, important, and constantly-evolving case. In order to adequately respond to petitioner's claims, the State requires more than the 20 days initially allotted.¹

Due to the above-described circumstances, the State submits that good cause exists to extend the filing due date and respectfully requests this Court's permission for an extension of time of an additional TWENTY (20) days to file its Answer to Petition for Writ of Mandamus or Prohibition, making the Answer due to be filed on or before September 17, 2012. This motion is made in good faith and not for purposes of undue delay.

Dated this 21st day of August, 2012.

Respectfully submitted,

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

BY /s/ Ryan J. MacDonald RYAN J. MACDONALD Deputy District Attorney Nevada Bar #12615 Office of the Clark County District Attorney Regional Justice Center 200 Lewis Avenue, P.O. Box 552212 Las Vegas, Nevada 89155-2212 (702) 671-2500

¹The State notes that Petitioner has filed a motion for emergency stay of district court proceedings in this Court on August 21, 2012. The State submits that because the trial date is October 22, 2012, a stay of district court proceedings is unnecessary at this time.

1	CERTIFICATE OF SERVICE		
2	I hereby certify and affirm that this document was filed electronically with		
3	the Nevada Supreme Court on August 21, 2012. Electronic Service of the		
4	foregoing document shall be made in accordance with the Master Service List as		
5	follows:		
6	CATHEDINE CODTEZ MASTO		
7	CATHERINE CORTEZ MASTO Nevada Attorney General		
8	MICHAEL V. CRISTALLI, ESQ. EUNICE M. MORGAN		
9	EUNICE M. MORGAN Counsels for Appellant		
10	RYAN J. MACDONALD		
11	Deputy District Attorney		
12			
13			
14	BY /s/ eileen davis		
15	Employee, District Attorney's Office		
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