

1 **MEMORANDUM**

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

5 The State's Answer on the instant matter is currently due on September 14,
6 2012. This petition challenges the sufficiency of a 40-page Indictment in a
7 complex, important, and constantly-evolving case. Despite this, Petitioner asserts
8 that this Court need not consider any of the grand jury proceedings below when
9 assessing whether extraordinary intervention in this matter is warranted. The State
10 strongly disagrees and asserts that the appendix Petitioner has submitted is
11 woefully insufficient. Accordingly, the State was compelled to assemble and
12 review a Respondent's Appendix that consists of approximately 2,600 pages of
13 complicated grand jury testimony.

14 Due to the above-described circumstances, the State submits that good cause
15 exists to extend the filing due date and respectfully requests this Court's
16 permission for an extension of time of FIVE (5) days to file its Answer to Petition
17 for Writ of Mandamus or Prohibition, making the Answer due to be filed on or
18 before September 21, 2012. This motion is made in good faith and not for
19 purposes of undue delay.

20 Dated this 17th day of September, 2012.

21 Respectfully submitted,

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

24 BY */s/ Ryan J. MacDonald*

25 **RYAN J. MACDONALD**
26 Deputy District Attorney
27 Nevada Bar #12615
28 Office of the Clark County District Attorney

1 **CERTIFICATE OF SERVICE**

2 I hereby certify and affirm that this document was filed electronically with
3 the Nevada Supreme Court on September 17, 2012. Electronic Service of the
4 foregoing document shall be made in accordance with the Master Service List as
5 follows:

6
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15 BY /s/ eileen davis
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