

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

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DIPAK KANTILAL DESAI,  
Appellant,

v.

THE STATE OF NEVADA,  
Respondent.

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Oct 29 2014 04:36 p.m.  
Tracie K. Lindeman  
Clerk of Supreme Court

CASE NO: 64591

**MOTION FOR ENLARGEMENT OF TIME  
(First Request)**

COMES NOW the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through his Deputy, RYAN J. MACDONALD, and moves this Court for an enlargement of time within which to file the State's Answering Brief. This motion is based on the following memorandum, declaration of counsel and all papers and pleadings on file herein.

Dated this 29<sup>th</sup> day of October, 2014.

Respectfully submitted,

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

BY */s/ Ryan J. MacDonald*

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RYAN J. MACDONALD  
Deputy District Attorney  
Nevada Bar #012615  
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200 Lewis Avenue  
P.O. Box 552212  
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## **MEMORANDUM**

I, RYAN J. MACDONALD, am a duly licensed attorney in the State of Nevada and am employed by the Clark County District Attorney's Office.

Respondent's Answering Brief is currently due October 30, 2014. This is a direct appeal from the Judgment of Conviction. This Court may extend the time to file a Respondent's Answering Brief upon a clear showing of good cause. NRAP 31(b)(3).

The State requests sixty days up to and including December 29, 2014, within which to file Respondent's Answering Brief. Appellant filed an Opening Brief with ninety-six pages and six separate and complex issues. Moreover, Appellant included a 41-volume appendix consisting of 9,486 pages. Therefore, considering the length of the Opening Brief, the extensive appendix, and the severity of the charges against Defendant, the State hereby makes this first request to extend time to allow additional time to review the appellate record and thoroughly brief Appellant's claims for this Court. This motion is made in good faith and not for the 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 29<sup>th</sup> day of October, 2014.

Respectfully submitted,

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

BY */s/ Ryan J. MacDonald*

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## **CERTIFICATE OF SERVICE**

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on October 29, 2014. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

CATHERINE CORTEZ MASTO  
Nevada Attorney General

FRANNY A. FORSMAN, ESQ.  
RICHARD A. WRIGHT, ESQ.  
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RYAN J. MACDONALD  
Deputy District Attorney

BY /s/ j.garcia  
Employee, District Attorney's Office

RJM/Genevieve Craggs /jg