

IN THE SUPREME COURT OF THE STATE OF NEVADA

TRANDON GREEN,
Appellant,

v.

THE STATE OF NEVADA,
Respondent.

CASE NO:

Electronically Filed
Jan 29 2021 07:09 a.m.
Elizabeth A. Brown
Clerk of Supreme Court
81563

MOTION FOR ENLARGEMENT OF TIME (FIRST REQUEST)

COMES NOW the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through his Deputy, JOHN NIMAN, 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 29th day of January, 2021.

Respectfully submitted,

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

BY */s/ John T. Niman*

JOHN T. NIMAN
Deputy District Attorney
Nevada Bar #014408
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

MEMORANDUM

I, JOHN NIMAN, 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 January 29, 2021. This is an appeal from a conviction following a seven (7) day jury trial. This Court may extend time to file a Respondent's Answering Brief upon a showing of good cause. NRAP 31(b)(3).

The State herein makes its first request for an enlargement of time. The State requests thirty (30) additional days to include March 1, 2021, within which to file Respondent's Answering Brief. The State's Criminal Appeals Unit has reviewed the district court record and requires more time to fully prepare the Answering Brief due the nature of Appellant's claims. The complex issues of law require more time to adequately brief and prepare sufficient responses to. Appellant has had substantial time to identify and brief numerous issues in the instant appeal. Respondent respectfully requests additional time to adequately prepare and file an adequate response to all of Appellant's claims in the Opening Brief. Moreover, Appellant was granted an extension to file his Docketing Statement on August 28, 2020, September 21, 2020, and October 20, 2020. Further, this Court filed a Notice to File Opening Brief and Appendix on December 15, 2020. If granted, the new filing date for the State's Answering Brief would be March 1, 2021. 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.

Dated this 29th day of January, 2021.

Respectfully submitted,

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

BY */s/ John T. Niman*

JOHN T. NIMAN
Deputy District Attorney
Nevada Bar #014408
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

CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on 29th day of January, 2021. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

AARON D. FORD
Nevada Attorney General

JEANNIE N. HUA
Counsel for Appellant

JOHN T. NIMAN
Deputy District Attorney

/s/ J. Garcia

Employee, Clark County
District Attorney's Office

JTN/Skyler Sullivan/jg