

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

JUL 28 2008

TRACIE K. LINDEMAN
CLERK OF SUPREME COURT
BY R. Malone
DEPUTY CLERK

MARK R. ZANA,

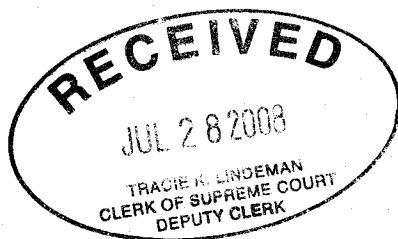
Appellant,

v.

Case No. 50786

THE STATE OF NEVADA,

Respondent

MOTION FOR ENLARGEMENT OF TIMECHRISTOPHER R. ORAM, ESQ.
Attorney at Law
Nevada Bar No. 004349
520 South Fourth Street, 2nd Fl.
Las Vegas, Nevada 89101
(702) 384-5563DAVID ROGER
Clark County District Attorney
Nevada Bar #002781
Regional Justice Center
200 Lewis Avenue
Post Office Box 552212
Las Vegas, Nevada 89155-2212
(702) 671-2500CATHERINE CORTEZ MASTO
Nevada Attorney General
Nevada Bar #003926
100 North Carson Street
Carson City, Nevada 89701-4717
(775) 684-1265EXTENSION OF TIME IS SO ORDERED TO
AND INCLUDING AUGUST 29, 2008J. Lindeman, Clerk of Court
cc: Counsel of Record

Counsel for Appellant

Counsel for Respondent

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

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5 MARK R. ZANA,

6 Appellant,

7 v.

Case No. 50786

8 THE STATE OF NEVADA,

9 Respondent


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11 **MOTION FOR ENLARGEMENT OF TIME**

12 COMES NOW the State of Nevada, by DAVID ROGER, Clark County District
13 Attorney, through his Chief Deputy District Attorney, STEVEN S. OWENS, and
14 moves this Court for an enlargement of time within which to file Respondent's
15 Answering Brief up to and including August 29, 2008. This motion is based on the
16 following memorandum, declaration and all papers and pleadings on file herein.

17 Dated this 25th day of July, 2008.

18 DAVID ROGER
19 Clark County District Attorney
Nevada Bar # 002781

20
21 BY


22 STEVEN S. OWENS
23 Chief Deputy District Attorney
24 Nevada Bar #004352
25 Office of the Clark County District Attorney
26 Regional Justice Center
27 200 Lewis Avenue
28 Post Office Box 552212
Las Vegas, Nevada 89155-2212
(702) 671-2500

1 MEMORANDUM

2 NRAP 26(b) permits this Court to enlarge the time for doing any act upon good
3 cause shown even when the time for doing the act has passed.

4 Four law clerks recently left the office, which was followed by three more law
5 clerks moving into attorney positions and this has put significant strains on the two
6 remaining law clerk's ability to complete assignments before they are due. New law
7 clerks will be arriving in August and will be inundated with a backlog of cases. After
8 being granted an extension of time, Appellant filed a 67 page Opening Brief with 8
9 Volumes of Appendix. More time is required to properly address and respond to each
10 of the issues raised in Appellant's Opening Brief.

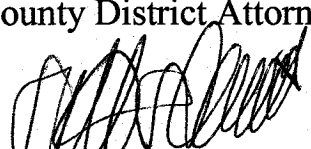
11 Rather than rush to complete the State's Brief, the State moves for an
12 enlargement of time of thirty (30) days within which to file Respondent's Answering
13 Brief up to and including August 29, 2008. This will allow the State sufficient time to
14 draft a brief which adequately sets forth the State's position and won't require
15 superficial editing and a rush to format the brief.

16 Dated this 25th day of July, 2008.

17 Respectfully submitted,

18 DAVID ROGER,
19 Clark County District Attorney

20 BY

21 
22 STEVEN S. OWENS
23 Chief Deputy District Attorney
24 Nevada Bar #004352
25 Office of the Clark County District Attorney
26 Regional Justice Center
27 200 Lewis Avenue
28 Post Office Box 552212
Las Vegas, Nevada 89155-2212
(702) 671-2500

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I declare under penalty of perjury the factual representations set forth in the foregoing memorandum are true and correct.

DATED this 25th day of July, 2008.

BY

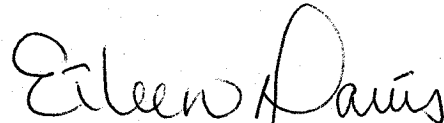
STEVEN S. OWENS
Chief Deputy District Attorney
Nevada Bar #004352
Office of the Clark County District Attorney
Regional Justice Center
200 Lewis Avenue
Post Office Box 552212
Las Vegas, Nevada 89155-2212
(702) 671-2500

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CERTIFICATE OF MAILING

I hereby certify and affirm that I mailed a copy of the foregoing Motion For
Enlargement of Time to the attorney of record listed below on July 25, 2008.

CHRISTOPHER R. ORAM
Attorney at Law
520 South Fourth Street, 2nd Floor
Las Vegas, Nevada 89101



Employee, Clark County
District Attorney's Office

SSO/ed