

• ORIGINAL •

IN THE SUPREME COURT OF THE STATE OF NEVADA

TERRENCE KARYIAN BOWSER,

Appellant,

vs.

THE STATE OF NEVADA,

Respondent.

Case No. 50851

**FILED**

SEP 02 2008

TRACIE K. LINDEMAN  
CLERK OF SUPREME COURT  
BY S. Young  
DEPUTY CLERK

**APPELLANT'S MOTION FOR EXTENSION OF TIME**

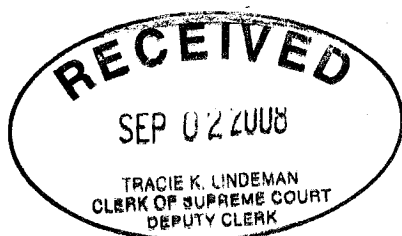
COMES NOW Appellant TERRENCE KARYIAN BOWSER, through Deputy Public Defender AUDREY M. CONWAY, and moves this Honorable Court to grant an extension of forty-five (45) days from the filing of the final transcript within which to file the Opening Brief in the above case.

This Motion is based upon the attached declaration of counsel.

DATED this 26th day of August, 2008.

PHILIP J. KOHN  
CLARK COUNTY PUBLIC DEFENDER

By Audrey M. Conway  
AUDREY M. CONWAY, #5611  
Deputy Public Defender  
309 So. Third Street, Suite #226  
Las Vegas, Nevada 89155-2610  
(702) 455-2685



**DECLARATION OF AUDREY M. CONWAY**

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2 1. I am an attorney duly licensed to practice law in the State of Nevada and the  
3 Deputy Public Defender assigned to represent TERRENCE KARYIAN BOWSER on appeal  
4 currently pending before this Court.

5 2. The Opening Brief was due to be filed on or before Tuesday, August 26, 2008.

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7 3. That as of Tuesday, August 26, 2008, declarant has not received the final  
8 transcript of 12/05/07 (sentencing hearing). This transcript is a necessary part of the appeal and  
9 once it is received will need to be reviewed and incorporated into the appendix. In addition, any  
10 additional issues will need to be researched and incorporated into the Opening Brief.

11 4. The appendix is also missing numerous other transcripts that declarant was not  
12 aware had been filed until today. As declarant was verifying the actual number of missing  
13 transcripts, declarant located several transcripts which had inadvertently been misplaced and  
14 omitted from the appendix and from declarant's appellate case file. Due to the inadvertent  
15 omission of these transcripts from the appendix and the case file, declarant believed they had not  
16 been filed. As a result, declarant has yet to review and analyze these transcripts and incorporate  
17 any issues related to these transcripts into the Opening Brief.  
18  
19

20 5. The charges in this case include Conspiracy to Commit Murder, Murder in the  
21 First Degree with Use of a Deadly Weapon, and four additional counts of Conspiracy and  
22 Discharging a Firearm. Mr. Bowser faced the death penalty in this case, and ultimately received  
23 a sentence of forty years to life in Nevada State Prison.

24  
25 6. Because of the complexity of the issues in this case, the seriousness of the  
26 charges, the severity of the sentence imposed, and the need for additional time to analyze the  
27 recently-located transcripts and the unfiled sentencing transcript, declarant respectfully requests  
28 an extension of 45 days from the filing of the final transcript in order to finalize and file the  
Opening Brief.

1 7. This request for an extension is made in good faith and not for the purpose of  
2 delay.

3 I declare under penalty of perjury that the foregoing is true and correct.

4 EXECUTED on the 26<sup>th</sup> day of August, 2008.

5  
6   
7 AUDREY M. CONWAY  
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16 **CERTIFICATE OF MAILING**

17 I hereby certify and affirm that I mailed a copy of the foregoing Appellant's  
18 Motion for Extension of Time to the attorney of record listed below on this 26<sup>th</sup> day of August,  
19 2008.  
20

21 DAVID ROGER  
22 CLARK COUNTY DISTRICT ATTORNEY  
23 200 Lewis Avenue, 3<sup>rd</sup> Floor  
24 Las Vegas, NV 89155

25 BY 

26 Employee, Clark County Public  
27 Defender's Office  
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