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

CLERK OF SUPREME COURT

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**FILED**

APR 13 2009

TERRENCE KARYIAN BOWSER,

Appellant,

v.

THE STATE OF NEVADA,

Respondent.

TRACIE K. LINDEMAN  
CLERK OF SUPREME COURT  
BY *[Signature]*  
DEPUTY CLERK

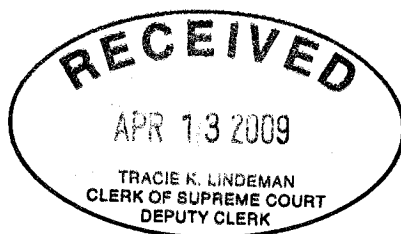
Case No. 50851

**MOTION FOR LEAVE TO FILE  
52 PAGE ANSWERING BRIEF**

AUDREY M. CONWAY  
Deputy Public Defender  
Nevada Bar #005611  
309 South Third Street, Ste. 226  
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DAVID ROGER  
Clark County District Attorney  
Nevada Bar #002781  
Regional Justice Center  
200 Lewis Avenue  
Post Office Box 552212  
Las Vegas, Nevada 89155-2212  
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State of Nevada

CATHERINE CORTEZ MASTO  
Nevada Attorney General  
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100 North Carson Street  
Carson City, Nevada 89701-4717  
(775) 684-1265



Counsel for Appellant

Counsel for Respondent

09-09213

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

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4  
5 TERRENCE KARYIAN BOWSER, )

6 Appellant, )

7 v. )

Case No. 50851

8 THE STATE OF NEVADA, )

9 Respondent. )

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11 **MOTION FOR LEAVE TO FILE**  
12 **52 PAGE ANSWERING BRIEF**

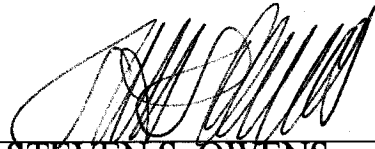
13 COMES NOW the State of Nevada, by DAVID ROGER, Clark County District  
14 Attorney, through his Chief Deputy, STEVEN S. OWENS, pursuant to NRAP 28(g)  
15 and the attached Declaration of Counsel, respectfully moves for leave to file a 52 page  
16 Answering Brief.

17 Dated this 8<sup>th</sup> day of April, 2009.

18 Respectfully submitted,

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

21  
22  
23 BY

  
24 STEVEN S. OWENS  
25 Nevada Bar No. 004352  
Chief Deputy District Attorney

26 Attorney for Respondent  
27  
28

**DECLARATION**  
(NRS 53.045)

I, STEVEN S. OWENS, am a duly licensed attorney in the State of Nevada and am employed by the Clark County District Attorney's Office.

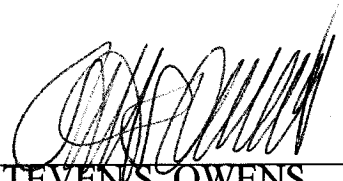
In order to fully develop the facts and answer the issues raised by Defendant in his 47 page Opening Brief, in which Appellant raised twelve (12) issues with nine (9) volumes of appendix, the State must focus on including pertinent facts and testimony elicited during the trial. It has been necessary to prepare a 52 page Answering Brief to fully develop and address Appellant's twelve (12) issues.

This Court authorized Appellant's over-sized Opening Brief which also necessitated the State's Answering Brief to exceed the page limit as well.

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

Executed April 8, 2009.

BY

  
\_\_\_\_\_  
STEVEN S. OWENS  
Nevada Bar No. 004352  
Chief Deputy District Attorney

## CERTIFICATE OF MAILING

I hereby certify and affirm that I mailed a copy of the foregoing Motion for Leave to File 52 Page Answering Brief to the attorney of record listed below on April 8, 2009.

**AUDREY M. CONWAY**  
Deputy Public Defender  
309 South Third Street, Ste. 226  
Las Vegas, Nevada 89155

*Ellen Davis*  
Employee, Clark County  
District Attorney's Office