

ORIGINAL

IN THE SUPREME COURT OF THE STATE OF NEVADA

**FILED**

**APR 29 2009**

ZANE MICHAEL FLOYD,

Appellant,

v.

THE STATE OF NEVADA,

Respondent

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

Case No. 51409

**MOTION FOR EXTENSION OF TIME  
(first request)**

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Counsel for Respondent

**APR 29 2009**

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5 ZANE MICHAEL FLOYD,

6 Appellant,

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8 THE STATE OF NEVADA,

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10 **MOTION FOR EXTENSION TIME**

11 **(first request)**

12 COMES NOW the State of Nevada, by DAVID ROGER, Clark County District

13 Attorney, through his Chief Deputy, STEVEN S. OWENS, and moves this Court for

14 an extension of time within which to file Respondent's Answering Brief. This motion


15 is based on the following memorandum and all papers and pleadings on file herein.

16 Dated this 27<sup>th</sup> day of April, 2009.

17 Respectfully submitted,

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

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21  
22 BY

  
23 STEVEN S. OWENS  
24 Chief Deputy District Attorney  
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**MEMORANDUM**

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. I am the chief deputy in charge of the Criminal Appeals Unit.

Pursuant to NRAP 26(b), this Court for good cause shown can enlarge the time prescribed by the Nevada Rules of Appellate Procedure for doing any act, or may permit an act to be done after the expiration of such time. In addition, this is a death penalty case and Supreme Court Rule 250(7)(d) allows for an initial extension of time of up to sixty (60) days upon showing of good cause.

With respect to good cause, Appellant's Opening Brief is 85 pages long and raises three complex main issues with numerous sub-issues, and references thirty-seven (37) volumes of appendix containing 7,425 pages.

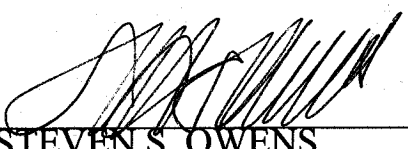
The State respectfully moves for an enlargement of time of sixty (60) days, making said brief due Friday, June 26, 2009. Granting the enlargement of time will allow the law clerk the additional time necessary to thoroughly review, adequately research and address Appellant's claims.

Dated this 27<sup>th</sup> day of April 2009.

Respectfully submitted,

DAVID ROGER  
Clark County District Attorney  
Nevada Bar # 002781

BY

  
STEVEN S. OWENS  
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