

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

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5 ZANE MICHAEL FLOYD,

6 Appellant,

7 v.

8 THE STATE OF NEVADA,

9 Respondent.

) Case No. 51409
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Electronically Filed
Oct 08 2009 03:58 p.m.
Tracie K. Lindeman

10
11 **MOTION FOR LEAVE TO FILE**
12 **44 PAGE RESPONDENT'S 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 26(b)
15 and the attached Memorandum, respectfully moves for leave to file a 44 page
16 Respondent's Answering Brief.

17 Dated this 8th day of October 2009.

18 Respectfully submitted,

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

22
23 BY /s/Steven S. Owens

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

27 Attorney for Respondent
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1 **MEMORANDUM**

2 I, STEVEN S. OWENS, am a duly licensed attorney in the State of Nevada and
3 am employed by the Clark County District Attorney's Office. I am the Chief Deputy
4 in charge of the Criminal Appeals Unit.

5 In order to fully develop the facts and answer the issues raised by Defendant in
6 his 90 page Opening Brief, it has been necessary to prepare a 44 page Answering
7 Brief.

8 On March 27, 2009, this Court authorized Appellant's over-sized which
9 necessitated the State's Answering Brief to exceed the page limit as well.

10 DATED this 8th day of October, 2009.

11
12 BY /S/Steven S. Owens

13 STEVEN S. OWENS
14 Chief Deputy District Attorney
Nevada Bar #004352

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CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on this 8th day of October, 2009. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Steven S. Owens
Catherine Cortez Mastos
Danielle Hurst

/s/ Margie English
Employee, Clark County
District Attorney's Office

OWENS/Mike Schwartzer