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) Case No. 52788

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Jul 20 2009 09:55 a.m.
Tracie K. Lindeman

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1 **MEMORANDUM**

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

4 Respondent's Answering Brief is currently due July 16, 2009. Pursuant to NRAP
5 26(b), this Court for good cause shown can enlarge the time prescribed by the Nevada Rules
6 of Appellate Procedure for doing any act.

7 With respect to good cause, this is a complex case with a lengthy procedural history.
8 The Opening Brief includes seven (7) complex issues that the State must address and is
9 accompanied by a five (5) volume appendix that is 1586 pages in length. Respondent
10 requires more time to prepare its Answering Brief in these circumstances.

11 Accordingly, the State requests thirty (30) days up to and including August 14, 2009,
12 within which to file Respondent's Answering Brief and regrets any inconvenience this may
13 cause the Court.

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

16 Dated this 15th day of July, 2009.

17
18 Respectfully submitted,

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

21
22 BY */s/ Steven S. Owens*

23 STEVEN S. OWENS
Chief Deputy District Attorney
24 Nevada Bar #004352
Office of the Clark County District Attorney
25 Regional Justice Center
200 Lewis Avenue
26 Post Office Box 552212
Las Vegas, Nevada 89155-2212
27 (702) 671-2750
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CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on July 15, 2009. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

CATHERINE CORTEZ MASTO
Nevada Attorney General

MARTIN HART, ESQ.
Law Offices of Martin Hart, LLC.

STEVEN S. OWENS
Chief Deputy District Attorney

BY /s/ eileen davis
Employee, District Attorney's Office

SSO/Adam Gill/ed