

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

LESEAN TARUS COLLINS,
Appellant,
v.
THE STATE OF NEVADA,
Respondent

Case No. 5571

COMES NOW the State of Nevada, by DAVID ROGER, Clark County District Attorney, through his Chief Deputy, STEVEN S. OWENS, and moves this Court for an enlargement of time of thirty (30) days from September 1, 2011, making said brief due October 3, 2011. This motion is based on the following memorandum and all papers and pleadings on file herein.

Dated this 1st day of September, 2011.

Respectfully submitted,

DAVID ROGER
Clark County District Attorney
Nevada Bar # 002781

BY /s/ Steven S. Owens

STEVEN S. OWENS
Chief Deputy District Attorney
Nevada Bar #004352
Office of the Clark County District Attorney
200 Lewis Avenue
Post Office Box 552212
Las Vegas, Nevada 89155-2212
(702) 671-2750

1 **MEMORANDUM**

2 I, STEVEN S. OWENS, am the supervising attorney in the above-captioned case.
3 The State is requesting a thirty (30) day extension of time in which to file its Answering
4 Brief under NRAP 31. No previous extensions have been granted to the State. Defendant
5 received eight (8) extensions of time prior to filing his Opening Brief. As good cause for the
6 extension, the State cites the large size of the record and number of pages in the Opening
7 Brief.

8 This is an appeal from a district court's Judgment of Conviction entered on May 6,
9 2009. Appellant filed his Notice of Appeal on March 4, 2010 and filed his Opening Brief on
10 August 2, 2011. Respondent's Answering Brief is due on or before September 1, 2011.

11 Pursuant to NRAP 26(b), this Court for good cause shown can enlarge the time
12 prescribed by the Nevada Rules of Appellate Procedure for doing any act, or may permit an
13 act to be done after the expiration of such time. In addition, NRAP 31 allows for an initial
14 extension of time of up to thirty (30) days upon a showing of good cause.

15 This multiple count case, involving several burglary and grand larceny convictions,
16 involves a large record consisting of a four (4) volume appendix—consisting of 831 pages.
17 The twenty-two (22) page Opening Brief raises approximately two (2) main issues and over
18 five (5) sub-issues.

19 The State respectfully moves for an enlargement of time of thirty (30) days, making
20 said brief due on Monday, October 3, 2011. This will give the State sufficient time to
21 thoroughly review and respond fully to the material in Appellant's Opening Brief.

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

24 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated this 1st day of September, 2011.

Respectfully submitted,

DAVID ROGER
Clark County District Attorney
Nevada Bar # 002781

BY */s/ Steven S. Owens*

STEVEN S. OWENS
Chief Deputy District Attorney
Nevada Bar #004352
Office of the Clark County District Attorney
200 Lewis Avenue
Las Vegas, Nevada 89155-2212
(702) 671-2750

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I HEREBY CERTIFY AND AFFIRM that this document was filed electronically with the Nevada Supreme Court on September 1, 2011. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

CATHERINE CORTEZ MASTO
Nevada Attorney General

P. DAVID WESTBROOK
Deputy Public Defender

STEVEN S. OWENS
Chief Deputy District Attorney

/s/ jennifer garcia

Employee, Clark County
District Attorney's Office

SSO/Chris Hamner/jg