

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

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3  
4 Electronically Filed  
Mar 07 2011 09:48 a.m.

5 WILLIAM P. CASTILLO,

) Case No. 56176

6 Appellant,

7 v.

8 THE STATE OF NEVADA,

9 Respondent

10  
11 **MOTION FOR EXTENSION TIME**  
**(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 an  
14 extension of time within which to file Respondent's Answering Brief. NRAP 250(7)(d).  
15 This motion is based on the following memorandum and all papers and pleadings on file  
16 herein.

17 Dated this 7<sup>th</sup> day of March, 2011.

18 Respectfully submitted,

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

21  
22  
23 BY /s/ Steven S. Owens

24 STEVEN S. OWENS  
Chief Deputy District Attorney  
25 Nevada Bar #004352  
Office of the Clark County District Attorney  
26 200 Lewis Avenue  
Post Office Box 552212  
27 Las Vegas, Nevada 89155-2212  
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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. I am the Chief Deputy in charge  
4 of the Criminal Appeals Unit.

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

10 With respect to good cause, Appellant's Opening Brief is 116 pages long and raises  
11 fifteen (15) main issues with numerous sub-issues, and references twenty-one (21) volumes  
12 of appendix containing 5,142 pages. Appellant requested and was granted three (3)  
13 extensions of time.

14 The State respectfully moves for an enlargement of time of sixty (60) days, making  
15 said brief due Friday, May 6, 2011. Granting the enlargement of time will allow the  
16 additional time necessary to thoroughly review, adequately research and address Appellant's  
17 claims.

18 Dated this 7<sup>th</sup> day of March, 2011.

19 Respectfully submitted,

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

23 BY */s/ Steven S. Owens*

24 STEVEN S. OWENS  
25 Chief Deputy District Attorney  
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## CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on March 7, 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

GARY A. TAYLOR  
Assistant Federal Public Defender

STEVEN S. OWENS  
Chief Deputy District Attorney

*/s/ eileen davis*

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Employee, Clark County  
District Attorney's Office

SSO/ed