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WILLIAM P. CASTILLO,
Appellant,
v.
THE STATE OF NEVADA,
Respondent

Case No. 56176

76 Tracie K. Lindeman

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 extension of time within which to file Respondent's Answering Brief. NRAP 250(7)(d). This motion is based on the following memorandum and all papers and pleadings on file herein.

Dated this 6th day of May, 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
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(702) 671-2750

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MEMORANDUM

I, STEVEN S. OWENS, am the supervising attorney in the above-captioned case. The State's Answering Brief is currently due on May 6, 2011. The State is requesting a THIRTY (30) day extension of time in which to file its Answering Brief, making it due on June 6, 2011. Pursuant to NRAP 31(b)(3), this Court for good cause shown can enlarge the time prescribed by the Nevada Rules of Appellate Procedure for the filing of an Answering Brief. As good cause for the extension in the instant case, the State cites the complexity of the issues presented. In particular, Appellant raises fifteen (15) main issues with numerous sub-issues. Moreover, this is a death penalty case with an extensive history dating back to 1996. The State requires additional time to adequately research and respond to Appellant's 116-page opening brief.

The certificate of service in Appellant's Opening Brief is dated January 31, 2011. Appellant's Opening Brief is 116 pages in length and raises issues and sub-issues covering complex questions of trial court procedure and alleges instances of judicial error that require a thorough review of the record. Based on the foregoing, the State requires an additional THIRTY (30) days to fully respond to this appeal. This is the State's second Motion for an Extension of Time in this matter. Appellant was previously granted three (3) extensions of time.

Dated this 6th day of May, 2011.

Respectfully submitted,

DAVID ROGER
Clark County District Attorney
Nevada Bar # 002781

BY */s/ Steven S. Owens*

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CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on May 6, 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

Employee, Clark County
District Attorney's Office

SSO/Tyler Smith//ed