1	IN THE SUPREME COURT OF THE STATE OF NEVADA
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4	Electronically Filed Jun 13 2011 02:10 p.m.
5	SAMUEL HOWARD, ) Case No. 5746Tracie K. Lindeman Clerk of Supreme Court
6	Appellant,
7	V
8	THE STATE OF NEVADA,
9	Respondent 5
10	MOTION FOR ENLARGEMENT OF TIME
11	(First Request)
12	COMES NOW the State of Nevada, by DAVID ROGER, Clark County District
13	Attorney, through his deputy, NANCY A. BECKER, and moves this Court for an extension
14	of time within which to file Respondent's Answering Brief. This motion is based on the
15	following memorandum and all papers and pleadings on file herein.
16	Dated this 13 <sup>th</sup> day of June, 2011.
17	DAVID ROGER
18	Clark County District Attorney Nevada Bar # 002781
19	
20	BY /s/Nancy A. Becker
21	NANCÝ A. BECKER
22	Chief Deputy District Attorney Nevada Bar #00145
23	Office of the Clark County District Attorney
24	200 Lewis Avenue Post Office Box 552212
25	Las Vegas, Nevada 89155-2212 (702) 671-2750
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1	<b>MEMORANDUM</b>
2	I, NANCY A. BECKER, 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 SCR 250(7)(d) and NRAP 31. No previous extensions have been requested or
5	granted.
6	Respondent's Answering Brief is currently due June 13, 2011. Pursuant to NRAP
7	31(b)(3)(D), this Court for good cause shown can enlarge the time in a capital case
8	prescribed by the Nevada Rules of Appellate Procedure for doing any act. With respect to
9	good cause, Appellant has filed a sixty-four (64) page Opening Brief in a capital murder case
10	raising numerous complex issues alleging multiple errors at the pre-trial, trial, and appellate
11	levels. Additionally, Defendant has filed a fourteen (14) volume appendix.
12	The State respectfully moves for an enlargement of time of thirty (30) days within
13	which to file Respondent's Answering Brief, up to and including July 13, 2011. This will
14	give the State sufficient time to thoroughly review the record so that it can properly respond
15	to the material in Appellant's Opening Brief.
16	DATED this 13 <sup>th</sup> day of June, 2011.
17	Respectfully submitted,
18	DAVID ROGER,
19	Clark County District Attorney
20	
21	BY /s/ Nancy A. Becker NANCY A. BECKER
22	Chief Deputy District Attorney Nevada Bar #00145
23	Office of the Clark County District Attorney
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1	CEDTIEICATE OF SEDVICE
2	<u>CERTIFICATE OF SERVICE</u> I hereby certify and affirm that this document was filed electronically with the
2	Nevada Supreme Court on June 13, 2011. Electronic Service of the foregoing document
4	shall be made in accordance with the Master Service List as follows:
5	shan be made in accordance with the Waster Service List as follows.
6	CATHERINE CORTEZ MASTO Nevada Attorney General
7	MICHAEL CHARLTON
8	Assistant Federal Public Defender
9	NANCY A. BECKER Deputy District Attorney
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14	/s/ eileen davis
15	Employee, Clark County District Attorney's Office
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