IN THE SUPREME COURT OF THE STATE OF NEVADA 1 2 3 4 ORIGINAL ZANE MICHAEL FLOYD, 5 Appellant, 6 CASE NO. 36752 v. 7 THE STATE OF NEVADA, 8 Respondent. 9 10 11 MOTION FOR LEAVE TO FILE 12 **37 PAGE ANSWERING BRIEF** 13 STEWART L. BELL MORGAN D. HARRIS 14 Clark County District Attorney Nevada Bar No. 000477 Clark County Court House 200 South Third Street, Suite 701 Clark County Public Defender Nevada Bar No. 001879 309 South Third Street, Suite 226 15 Post Office Box 552610 16 Las Vegas, Nevada 89155-2610 (702) 455-4685 Post Office Box 552212 Las Vegas, Nevada 89155-2211 (702) 455-4711 17 18 FRANKIE SUE DEL PAPA Nevada Attorney General Nevada Bar No. 000192 19 20 100 North Carson Street Carson City, Nevada 89701-4717 (775) 684-1265 21 22 23 24 25 SEP 19 2001 26



Counsel for Appellant

27

28

Counsel for Respondent

IN THE SUPREME COURT OF THE STATE OF NEVADA 1 2 3 4 ZANE MICHAEL FLOYD, 5 Appellant, 6 CASE NO. 36752 7 v. THE STATE OF NEVADA, 8 Respondent. 9 10 11 MOTION FOR LEAVE TO FILE 37 PAGE ANSWERING BRIEF 12 COMES NOW, the State of Nevada, by STEWART L. BELL, Clark County 13 District Attorney, through his Chief Deputy, LYNN M. ROBINSON, pursuant to 14 NRAP 28(g) and the attached Declaration of Counsel, respectfully moves for leave 15 to file a 37 page Answering Brief. 16 Dated September 17, 2001. 17 18 Respectfully submitted, 19 STEWART L. BELL District Attorney 20 21 22 23 Chief Deputy 24 25 Attorney for Respondent 26

27

28

//

//

DECLARATION

(NRS 53.045)

I, LYNN M. ROBINSON, am a duly licensed attorney in the State of Nevada and am employed by the Clark County District Attorney's Office.

I am a Chief Deputy District Attorney in the Criminal Appeals Division. In order to fully develop the facts and answer the seven issues raised by the Defendant in his 46 page Opening Brief, it has been necessary to prepare a 37 page Answering Brief.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed on September 17, 2001.

LYNN M. ROBINSON Nevada Bar No. 3801

Chief Deputy

Attorney for Respondent

CERTIFICATE OF MAILING

I hereby certify and affirm that I mailed a copy of the foregoing Motion for Leave to File a 37 Page Answering Brief to the attorney of record listed below on September 17, 2001.

MORGAN D. HARRIS Clark County Public Defender 309 South Third Street, Suite 226 Post Office Box 552610 Las Vegas, Nevada 89155-2610

Employee, Clark Count

District Attorney's Office

27

1

2

3

4

5

6

7

8

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

28 Tuftel

Tufteland/David Schubert/english



OFFICE OF THE DISTRICT ATTORNEY

POST-CONVICTION PROCESSES

Clark County Courthouse • 200 S Third St • PO Box 552211 • Las Vegas NV 89155-2211 (702) 455-4843 • Fax: (702) 383-8465

STEWART L. BELL

District Attorney

J. CHARLES THOMPSON
Assistant District Attorney

MICHAEL DAVIDSON
Assistant District Attorney

September 17, 2001

JAMES TUFTELAND

Chief Deputy

LYNN M. ROBINSON
Chief Deputy

The Honorable Janette Bloom Clerk of the Supreme Court Office of the Clerk State of Nevada Capitol Complex Carson City, Nevada 89710

Re: Zane Michael Floyd,

v. State of Nevada No. 36752

Dear Ms. Bloom:

SEP 19 2001

JANETTE M BLOOM
CLERK OF SUPREME COURT
DEPUTY CLERK

We are enclosing the original and two copies of Respondent's Answering Brief and the original and one copy of our Motion for Leave to File 37 Page Answering Brief in the above-captioned matter for filing in your office and consideration by the Court.

Very truly yours,

STEWART L. BELL District Attorney

MAMES TUPTELAND

Chief Deputy

TUFTELAND/Dave Schubert/english

Encl.

cc: Attorney General