

1 MEMORANDUM

2 I, STEVEN S. OWENS, am the supervising attorney in the above-captioned
3 case. This Court may extend the time to file an Opening Brief upon a clear
4 showing of good cause. NRAP 31(b)(3)(B).

5 The State's Opening Brief on the instant matter is currently due May 14,
6 2012. The State of Nevada filed this Appeal to challenge the district court's
7 dismissal of an Indictment for failing to plead sufficient facts per NRS 173.075.
8 Due to the confusion of the district court's order, a careful review and
9 interpretation of the available documents on file is necessary. While the majority of
10 the research is done for this Brief, the brief must be reviewed by multiple attorneys
11 in the District Attorney's Office as this case involves high profile government
12 actors. The State therefore submits good cause exists to extend the filing due date.
13 The instant motion is the first request for an extension in this case.

14 Due to the above-described circumstances, Appellant respectfully requests
15 this Court's permission for an extension of time of thirty (30) days to file its
16 Opening Brief; making the Brief due to be filed on or before Wednesday, June 13,
17 2012. This motion is made in good faith and not for purposes of undue delay.

18 Dated this 14th day of May, 2012.

19 Respectfully submitted,

20 STEVEN B. WOLFSON
21 Clark County District Attorney

22 BY */s/ Steven S. Owens*

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify and affirm that this document was filed electronically with
3 the Nevada Supreme Court on May 14, 2012. Electronic Service of the foregoing
4 document shall be made in accordance with the Master Service List as follows:

5
6 CATHERINE CORTEZ MASTO
Nevada Attorney General

7 DANIEL J. ALBREGTS, ESQ.
8 Counsel for Appellant

9 STEVEN S. OWENS
10 Chief Deputy District Attorney

11 I further certify that I served a copy of this document by mailing a true and
12 correct copy thereof, postage pre-paid, addressed to:

13 FRANNY FORSMAN, ESQ.
14 P.O. Box 43401
15 Las Vegas, NV 89116

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18 BY /s/ eileen davis
Employee, District Attorney's Office

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26 SSO/Leah Beverly/ed