

1 **MEMORANDUM**

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

5 The State’s Answering Brief on the instant matter is currently due April 4,
6 2012. Appellant’s opening brief over one hundred thirty (130) pages and addresses
7 seventy nine (79) claims from Appellant’s Petition for Writ of Habeas Corpus filed
8 in the district court. Appellant’s appendix consists of eleven (11) volumes and over
9 two thousand (2000) pages, which includes almost eight hundred (800) pages of
10 trial transcript and Appellant’s Petition, which is also almost eight hundred (800)
11 pages. The issues presented are numerous and fact intensive, and the record is
12 extensive. The State therefore submits good cause exists to extend the filing due
13 date. The instant motion is the first request for an extension in this case.

14 Due to the above-described circumstances, Respondent respectfully requests
15 this Court’s permission for an extension of time of thirty (30) days to file its
16 Answering Brief; making the Response due to be filed on or before Friday, May 4,
17 2012. This motion is made in good faith and not for purposes of undue delay.

18 I declare under penalty of perjury the factual representations set forth in the
19 foregoing memorandum are true and correct.

20 Dated this 4th day of April, 2012.

21 Respectfully submitted,

22 STEVEN B. WOLFSON
23 Clark County District Attorney
Nevada Bar # 001565

24 BY */s/ Steven S. Owens*

25 STEVEN S. OWENS
26 Chief Deputy District Attorney
27 Nevada Bar #004352
28 Office of the Clark County District Attorney
200 Lewis Avenue
Las Vegas, Nevada 89155-2212

