



**MEMORANDUM**

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2 I, STEVEN S. OWENS, am the supervising attorney in the above-captioned  
3 case. The State is requesting a THIRTY (30) day extension of time in which to file  
4 its Fast Track Response. No previous extensions have been filed by or granted to  
5 the State.  
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7 Respondent's Fast Track Response is currently due on September 9, 2013.  
8 Pursuant to NRAP 3C(i)(2)(B), this Court can extend the time to file a fast track  
9 response upon demonstration of extreme need or merit. Appellant filed a Motion  
10 for Extension of Time to file its Fast Track Statement on June 18, 2013, which was  
11 granted by this Court.  
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14 This is an appeal from a Judgment of Conviction following a jury verdict for  
15 attempted murder with use of a deadly weapon in violation of a temporary  
16 protective order; burglary while in possession of a deadly weapon in violation of a  
17 temporary protective order; and battery with use of a deadly weapon constituting  
18 domestic violence resulting in substantial bodily harm in violation of a temporary  
19 protective order.  
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22 Appellant argues that the lower court erred in precluding a self-defense  
23 argument and a self-defense jury instruction; that the lower court erred in failing to  
24 notify the parties of a jury question regarding the required timing of intent for  
25 burglary; insufficient evidence as to Defendant's burglary conviction; and  
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1 cumulative error. As such, the State's Fast Track Response requires a very fact-  
2 intensive inquiry. The State must thoroughly review trial transcripts in order to  
3 effectively respond to Defendant's arguments and to evaluate the evidence  
4 presented regarding Defendant's guilt. Accordingly, the State's Fast Track  
5 Response requires additional time to complete.  
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8 Due to the above-described circumstances, Respondent respectfully requests  
9 this Court's permission for an extension of time of THIRTY (30) days to file its  
10 Fast Track Response, making the Response due to be filed on or before October 9,  
11 2013. This motion is made in good faith and not for purposes of undue delay.  
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13 Dated this 9<sup>th</sup> day of September 2013.

14 Respectfully submitted,

15 STEVEN B. WOLFSON  
16 Clark County District Attorney

17  
18 BY */s/ Steven S. Owens*

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