

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

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ANTHONY CASTANEDA,  
Appellant,

v.

THE STATE OF NEVADA,  
Respondent.

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Electronically Filed  
Jul 03 2014 11:50 a.m.  
Tracie K. Lindeman  
Clerk of Supreme Court

CASE NO: 64515

**MOTION FOR ENLARGEMENT OF TIME  
(First Request)**

COMES NOW the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through his Chief deputy, STEVEN S. OWENS, and moves this Court for an enlargement of time within which to file Respondent's Answering Brief. This motion is based on the following memorandum, declaration of counsel and all papers and pleadings on file herein.

Dated this 3<sup>rd</sup> day of July, 2014.

Respectfully submitted,

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

BY */s/ Steven S. Owens*

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STEVEN S. OWENS  
Chief Deputy District Attorney  
Nevada Bar #004352  
Office of the Clark County District Attorney  
Regional Justice Center  
200 Lewis Avenue  
P.O. Box 552212  
Las Vegas, Nevada 89155-2212

## **MEMORANDUM**

I, STEVEN S. OWENS, am the supervising attorney in the above-captioned case. The State is requesting a FORTY-FIVE (45) day enlargement of time in which to file its Answering Brief pursuant to NRAP 31. No previous extensions have been filed by or granted to the State.

The Answering Brief is currently due on Thursday, July 3, 2014. On December 13, 2013, this Court suspended briefing pending the filing of the Judgment of Conviction by the District Court. On January 3, 2014, this Court filed an Order Reinstating Briefing and allowed Appellant FORTY (40) DAYS in which to file a Fast Track Statement. On February 12, 2014, Appellant filed a Motion for Extension of Time Due to Late Receipt of Transcripts, and Alternatively, Motion for Full Briefing. This Court granted the Motion for Full Briefing on February 18, 2014, and allowed NINETY (90) DAYS for Appellant to file his Opening Brief. On May 19, 2014, Appellant filed a Motion for Extension of Time to File Opening Brief. On May 19, 2014, this Court granted an extension of NINE (9) DAYS, making the Opening Brief due on June 2, 2014. On June 3, 2014, Appellant filed his Opening Brief.

When an initial request is made, this Court will grant a motion for enlargement of time upon a clear showing of good cause. NRAP 31(b)(3). Here, this Appeal is from a SEVEN (7) DAY jury trial. Additionally, Appellant raises

NINE (9) claims of error, some with multiple sub-claims, in his Opening Brief. As such, the record must be thoroughly and diligently reviewed, and the State's Answering Brief requires additional time to complete.

Due to the above-described circumstances, Respondent respectfully requests this Court's permission for an enlargement of time of FORTY-FIVE (45) days to file its Answering Brief, making the Answering Brief due to be filed on or before Monday, August 18, 2014. This motion is made in good faith and not for purposes of undue delay.

Dated this 3<sup>rd</sup> day of July, 2014.

Respectfully submitted,

**STEVEN B. WOLFSON**  
Clark County District Attorney

BY */s/ Steven S. Owens*

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## **CERTIFICATE OF SERVICE**

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on July 3, 2014. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

CATHERINE CORTEZ MASTO  
Nevada Attorney General

AUDREY M. CONWAY  
Deputy Public Defender

STEVEN S. OWENS  
Chief Deputy District Attorney

BY /s/ j.garcia  
Employee, District Attorney's Office

SSO/Sarah Killer/jg