

IN THE SUPREME COURT OF THE STATE OF NEVADA

MICHAEL SCHOFIELD,
Appellant,

v.

THE STATE OF NEVADA,
Respondent.

Electronically Filed
Apr 20 2015 02:45 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

CASE NO: 65193

MOTION FOR ENLARGEMENT OF TIME

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 and all papers and pleadings on file herein.

Dated this 20th day of April, 2015.

Respectfully submitted,

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

BY /s/ Steven S. Owens
STEVEN S. OWENS
Chief Deputy District Attorney
Nevada Bar #004352
Office of the Clark County District Attorney

MEMORANDUM

I, STEVEN S. OWENS, am a duly licensed attorney in the State of Nevada and am employed by the Clark County District Attorney's Office.

Respondent's Answering Brief is currently due April 20, 2015. This Court may extend the time to file a Respondent's Answering Brief upon a clear showing of good cause. NRAP 31(b)(3). As such the State requests 60 days, up to and including June 19, 2015, within which to file Respondent's Answering Brief.

This is an appeal from the district court's Judgment of Conviction. After a jury trial, Appellant was convicted of Child Abuse, Neglect or Endangerment and First Degree Kidnapping. After receiving two extensions of time, Appellant filed an Opening Brief, which, among other things, challenges the plain language of Nevada's Kidnapping statute NRS 200.310. Moreover, Appellant included a 7-volume appendix consisting of over 1500 pages. Therefore, considering Appellant's prior extensions and his extensive appendix, the State hereby makes this first request to extend time to allow additional time to review the appellate record and thoroughly brief Appellant's claims for this Court. This motion is made in good faith and not for the purposes of undue delay.

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Dated this 20th day of April, 2015.

Respectfully submitted,

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

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 April 20, 2015. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

ADAM PAUL LAXALT
Nevada Attorney General

KAREN K. WONG, ESQ.
Counsel for Appellant

STEVEN S. OWENS
Chief Deputy District Attorney

BY /s/ E.Davis

Employee,
Clark County District Attorney's Office

SSO/Bryan Schwartz/ed