

IN THE SUPREME COURT OF THE STATE OF NEVADA

STEVEN DALE FARMER,
Appellant,

v.

THE STATE OF NEVADA,
Respondent.

Electronically Filed
Mar 30 2015 11:46 a.m.
Tracie K. Lindeman
Clerk of Supreme Court

CASE NO: 65935

**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 30th day of March, 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
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200 Lewis Avenue
P.O. Box 552212
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MEMORANDUM

I, STEVEN S. OWENS, am the supervising attorney in the above-captioned case. The State is requesting a 30 day extension of time in which to file its Answering Brief under NRAP 31(b)(3).

This is a direct appeal from a jury verdict of Sexual Assault, Indecent Exposure, and Open or Gross Lewdness. Appellant filed his Notice of Appeal on June 26, 2014 and his Opening Brief on February 27, 2015.

Appellant's Opening Brief was initially due on October 24, 2014, but the parties stipulated that the brief would be due on November 24, 2014. On November 24, 2014, Appellant filed a Motion for Extension of Time, requesting an additional 90 days in which to file his Opening Brief. This Court granted the motion, making the Opening Brief due February 23, 2015. Appellant filed his Opening Brief on February 27, 2015.

No Motions for Extension of Time have been requested or granted to the State. The Answering Brief is currently due on March 30, 2015.

As good cause for the extension, the State cites the following: Appellant's Opening Brief is 77 pages long and is based on an Appellant's Appendix of nearly 3,000 pages. In the Opening Brief, Appellant alleges nine claims of error, several of which are of constitutional magnitude. An adequate response by the State requires a thorough review of the record in order to fully address Appellant's

claims. Accordingly, the State's Answering Brief requires additional time to complete.

The State respectfully moves for an enlargement of time of 30 days, making said Answering Brief due on April 29, 2015. This will give the State sufficient time to thoroughly review and respond fully to the material in Appellant's Opening Brief. This motion is made in good faith and not for purposes of undue delay.

Dated this 30th day of March, 2015.

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 March 30, 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

DEBORAH L. WESTBROOK
Deputy Public Defender

STEVEN S. OWENS
Chief Deputy District Attorney

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

SSO/Meryl Francolini/jg