

IN THE SUPREME COURT OF THE STATE OF NEVADA

STEVEN DALE FARMER,
Appellant,

v.

THE STATE OF NEVADA,
Respondent.

CASE NO:

Electronically Filed
May 29 2015 08:23 a.m.
Trace K. Lindeman
Clerk of Supreme Court

**MOTION FOR LEAVE TO FILE RESPONDENT'S ANSWERING BRIEF
IN EXCESS OF TYPE-VOLUME LIMITATIONS**

COMES NOW the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through his Chief Deputy, STEVEN S. OWENS, pursuant to NRAP 28(g) and the attached Declaration of Counsel, respectfully moves for leave to file an Respondent's Answering Brief in Excess of Type-Volume Limitations pursuant to NRAP 32(a)(7)(D).

Dated this 28th day of May, 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
Attorney for Respondent

DECLARATION
(NRS 53.045)

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.

Except by Court Order, a Respondent's Answering Brief shall not exceed 30 pages in length or shall contain no more than 14,000 words or 1,300 lines of text. NRAP 32(a)(7)(A)(i)-(ii); NRAP 32(a)(7)(D).

On February 23, 2015, Appellant filed a Motion for Leave to File opening Brief in Excess of Type-Volume Limitation, requesting permission to file an Opening Brief containing 17,327 words, as well as his Opening Brief containing 17,327 words. On February 27, 2015, this Court granted the motion. In order to fully develop the facts and answer the issues Appellant raised therein, it has been necessary to prepare an Answering Brief containing 15,716 words.

Appellant's Opening Brief is 76 pages and raises multiple issues in depth, including multiple constitutional issues. Appellant's trial lasted sixteen (16) days, and the record is comprised of 15 volumes consisting of over 2,800 pages. The length of Appellant's Opening Brief necessitates a more detailed and lengthy response than the word limits of NRAP 32(a)(7) would normally permit. Respondent has diligently sought to respond in as concise a manner as possible, without sacrificing depth, breadth, or accuracy. See NRAP 32(a)(7)(A)(D)(i).

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated this 28th day of May, 2015.

Respectfully submitted,

STEVEN B. WOLFSON
Clark County District Attorney

BY */s/ Steven S. Owens*

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 28th day of May, 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

/s/ j. garcia

Employee, Clark County
District Attorney's Office