

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

STEVE DELL MCNEILL,

Appellant,

v.

THE STATE OF NEVADA,

Respondent.

Electronically Filed  
Jun 01 2015 11:35 a.m.  
Tracie K. Lindeman  
Clerk of Supreme Court

CASE NO: 66697

**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 1<sup>st</sup> day of June, 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 June 1, 2015. The State requests an additional 30 days within which to file Respondent's Answering Brief. Respondent's Answering Brief would then be due Wednesday, July 1, 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).

This is an appeal from a Judgment of Conviction. Appellant's Opening Brief is 72 pages, contains over 13,000 words, and raises complex constitutional issues. Therefore, the State is asking for additional time to research and prepare in order for this Court to be able to properly address Appellant's issues. This motion is the State's first request for time and is made in good faith and not for the purposes of undue delay.

Dated this 1<sup>st</sup> day of June, 2015.

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

## **CERTIFICATE OF SERVICE**

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on June 1, 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

SHARON G. DICKINSON  
Deputy Public Defender

STEVEN S. OWENS  
Chief Deputy District Attorney

BY /s/ E.Davis

Employee,  
Clark County District Attorney's Office

SSO/William Rowles/ed