

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

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GLENFORD BUDD,  
Appellant,  
v.  
THE STATE OF NEVADA,  
Respondent.

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Electronically Filed  
May 27 2015 03:47 p.m.  
Tracie K. Lindeman  
Clerk of Supreme Court

CASE NO: 66815

**MOTION FOR ENLARGEMENT OF TIME  
(Second 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 27<sup>th</sup> 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  
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 27, 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 30 days, up to and including June 26, 2015, within which to file Respondent's Answering Brief.

This is an appeal from the district court's Findings of Fact, Conclusions of Law and Order denying Appellant's post-conviction Petition for Writ of Habeas Corpus. After a jury trial, Appellant was convicted of three counts of Murder with Use of a Deadly Weapon and received life without the possibility of parole. This Court subsequently affirmed the conviction on direct appeal. Following this, the district court denied Appellant's post-conviction Petition for Writ of Habeas Corpus. After receiving two extensions of time, Appellant filed a 70-page Opening Brief, which raises several ineffective assistance of counsel claims. Specifically, Appellant challenges his counsel's performance both pre-trial and during trial. As such, an in-depth review of the pre-trial hearings, 7-day jury trial, and subsequent penalty hearing is necessary to fully address Appellant's claims. Therefore, considering the serious nature of this case and Appellant's punishment, the lengthy jury trial/penalty hearing, and Appellant's requests for two extensions of time, the State hereby makes

this second 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.

I declare under penalty of perjury that the factual representations set forth in the foregoing memorandum are true and correct.

Dated this 27<sup>th</sup> day of May, 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 May 27, 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

MATTHEW D. CARLING, ESQ.  
Counsel for Appellant

STEVEN S. OWENS  
Chief Deputy District Attorney

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

SSO/Bryan Schwartz/jg