

IN THE SUPREME COURT OF THE STATE OF NEVADA

CHRISTOPHER PIGEON,
Appellant,

v.

THE STATE OF NEVADA,
Respondent.

Electronically Filed
Apr 13 2015 02:25 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

CASE NO: 67083

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 13th 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 13, 2015. This case is an appeal from the Judgment of Conviction following a jury trial. Appellant filed his Opening Brief and Appendix on March 12, 2015. This Court may extend the time to file an Answering Brief for a case upon a showing of good cause. NRAP 31(b)(3).

The State requests thirty (30) days up to and including May 13, 2015, within which to file Respondent's Answering Brief. Appellant's Appendix includes four volumes, including a jury trial. Additionally, the appeal raises seven complex and fact-intensive questions, plus sub-issues, including issues regarding Appellant's competency, his self-representation, and the sufficiency of the evidence. In addition, the Appellant has filed a pro-per Notice of Appeal and appellate brief under the same case number, which is currently pending in the Court at this time.

Therefore, the State requests additional time to thoroughly research and address the arguments raised in Appellant's Opening Brief as well as to allow the Court time to resolve the issue of Appellant's pro se appeal. This Motion is made in good faith and not for purposes of undue delay.

Dated this 13th 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
Regional Justice Center
200 Lewis Avenue
P.O. Box 552212
Las Vegas, NV 552212
(702) 671-2500

CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on April 13, 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

SANDRA L. STEWART, ESQ.
Counsel for Appellant

STEVEN S. OWENS
Chief Deputy District Attorney

BY /s/ E.Davis

Employee,
Clark County District Attorney's Office

SSO/Elizabeth Anderlik/ed