

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

MICHAEL JOSEPH JEFFRIES,

Appellant,

v.

THE STATE OF NEVADA,

Respondent.

Electronically Filed  
Mar 14 2016 01:35 p.m.  
Tracie K. Lindeman  
Clerk of Supreme Court

CASE NO: 68338

**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 14<sup>th</sup> day of March, 2016.

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 March 14, 2016. 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 45 days up to and including April 28, 2016, within which to file Respondent's Answering Brief.

This is an appeal from the District Court's Judgment of Conviction. After a jury trial, Appellant was convicted of Second Degree Murder With Use of a Deadly Weapon. After receiving two extensions of time, Appellant filed a 55-page Opening Brief, along with a 3-volume appendix consisting of approximately 705 pages. Appellant raises five issues, requiring a review of a four-day jury trial. Therefore, the State hereby makes this first 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.

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Dated this 14<sup>th</sup> day of March, 2016.

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 this 14<sup>th</sup> day of March, 2016. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

ADAM PAUL LAXALT  
Nevada Attorney General

VINCENT SAVARESE, III, ESQ.  
Counsel for Appellant

STEVEN S. OWENS  
Chief Deputy District Attorney

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

SSO/Ekaterina Derjavina/jg