

IN THE SUPREME COURT OF THE STATE OF NEVADA

MICHAEL JOSEPH JEFFRIES,
Appellant,

v.

THE STATE OF NEVADA,
Respondent.

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Tracie K. Lindeman
Clerk of Supreme Court

CASE NO: 68338

MOTION FOR ENLARGEMENT OF TIME

Third 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 1st day of June, 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 June 1, 2016. This Court may extend the time to file an Answering Brief for a case upon a showing of good cause, and it may grant additional extensions of time "upon a showing of extraordinary circumstances and extreme need." NRAP 31(b)(3).

The State's has had two extensions due to the length and complexity of the issues included in the Opening Brief. The State makes its third request for an extension of time, citing the following as extraordinary circumstances and extreme need: After receiving two extensions of time, Appellant filed a 55-page Opening Brief, along with a 3-volume appendix consisting of approximately 705 pages. Albeit, Appellant's Appendix, the State needs to prepare a Respondent's Appendix. For this reason, the State requests additional time to compile a Respondent's Appendix that includes all the necessary documents needed for this Court's review on the issues presented on appeal.

The State requests additional 7 days up to and including June 10, 2016, to file Respondent's Answering Brief. This Motion is made in good faith and not for 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 1st day of June, 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 1st day of June, 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