

EXHIBIT E

EXHIBIT E

IN THE SUPREME COURT OF THE STATE OF NEVADA

MICHAEL JOSEPH JEFFRIES,

Appellant,

v.

THE STATE OF NEVADA,

Respondent.

Electronically Filed
Jun 01 2016 11:56 a.m.
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*

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 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

EXHIBIT D

EXHIBIT D

IN THE SUPREME COURT OF THE STATE OF NEVADA

MICHAEL JOSEPH JEFFRIES,
Appellant,
vs.
THE STATE OF NEVADA,
Respondent.

No. 68338

FILED

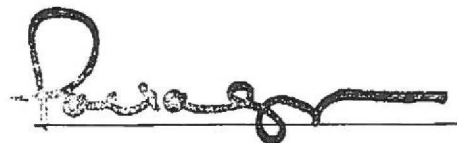
MAY 11 2016

TRACIE K. LINDEMAN
CLERK OF SUPREME COURT
BY S. Young
DEPUTY CLERK

ORDER GRANTING MOTION

Extraordinary circumstances and extreme need having been shown, respondent's motion requesting a second extension of time to file the answering brief is granted. NRAP 31(b)(3)(B). Respondent shall have until June 1, 2016, to file and serve the answering brief. Any additional extensions will be granted only on showing of extraordinary circumstances and extreme need. *Id.* Counsel's caseload normally will not be deemed such a circumstance. *Cf. Varnum v. Grady*, 90 Nev. 374, 528 P.2d 1027 (1974). Failure to timely file the answering brief may result in the imposition of sanctions.

It is so ORDERED.

 C.J.

cc: Gentile, Cristalli, Miller, Armeni & Savarese, PLLC
Attorney General/Carson City
Clark County District Attorney

EXHIBIT C

EXHIBIT C

IN THE SUPREME COURT OF THE STATE OF NEVADA

MICHAEL JOSEPH JEFFRIES,

Appellant,

v.

THE STATE OF NEVADA,

Respondent.

Electronically Filed
Apr 28 2016 03:56 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

CASE NO: 68338

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 28th day of April, 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 April 28, 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 requests 30 days up to and including June 1, 2016, within which to file Respondent's Answering Brief. Although the State initially believed that 45 days would be a sufficient extension of time, it has become apparent that the record and issues presented are more complex than originally anticipated.

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. The issues presented in the Opening Brief include several sub-issues that were not immediately apparent. Therefore, the State requests additional time to thoroughly research and address the arguments raised in Appellant's Opening Brief.

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 28th day of April, 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
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 this 28th day of April, 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

EXHIBIT B

EXHIBIT B

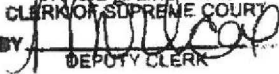
IN THE SUPREME COURT OF THE STATE OF NEVADA

MICHAEL JOSEPH JEFFRIES,
Appellant,
vs.
THE STATE OF NEVADA,
Respondent.

No. 68338

FILED

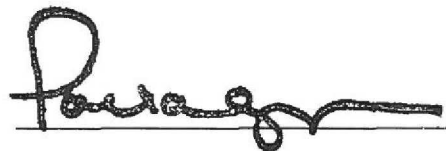
MAR 21 2016

TRACIE K. LINDEMAN
CLERK OF SUPREME COURT
BY  DEPUTY CLERK

ORDER GRANTING MOTION

Cause appearing, the motion for an extension of time to file the answering brief is granted. NRAP 31(b)(3)(B). Respondent shall have until April 28, 2016, to file and serve the answering brief. Given the length of this initial extension request, no further extensions shall be permitted absent extraordinary circumstances and extreme need. NRAP 31(b)(3)(B). Counsel's caseload normally will not be deemed such a circumstance. *Cf. Varnum v. Grady*, 90 Nev. 374, 528 P.2d 1027 (1974). Failure to timely file the answering brief may result in the imposition of sanctions. *See* NRAP 31(d).

It is so ORDERED.

 C.J.

cc: Gentile, Cristalli, Miller, Armeni & Savarese, PLLC
Attorney General/Carson City
Clark County District Attorney

EXHIBIT A

EXHIBIT A

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 14th 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.

///

///

///

Dated this 14th 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
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 this 14th 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

IN THE SUPREME COURT OF THE STATE OF NEVADA

MICHAEL JOSEPH JEFFRIES,
Defendant/Appellant,

vs.

THE STATE OF NEVADA,
Plaintiff/Respondent.

CASE NO. 68338

Electronically Filed
Jul 01 2016 01:32 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

**APPELLANT’S MOTION FOR IMPOSITION OF SANCTIONS AGAINST
RESPONDENT STATE OF NEVADA**

COMES NOW Michael Joseph Jeffries, Appellant in the above-entitled matter, by and through his attorney, Vincent Savarese III, Esq. of the law firm of Gentile Cristalli Miller Armeni Savarese, and pursuant to Rules 26 (b) (1) (B), 27, 28 (J) and 31(b) (3) (B) and (d) (2) of the Nevada Rules of Appellate Procedure (“NRAP”), hereby respectfully requests that this Court:

1. Strike Respondent’s Answering Brief; and/or
2. Preclude Respondent from being heard at oral argument; and/or
3. Deem Respondent to have confessed error and appropriate disposition of this appeal thereafter made.

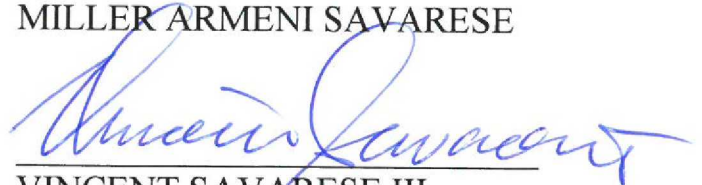
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...

THIS MOTION is made and based upon all pleadings and papers on file herein and the following Memorandum of Points and Authorities.

Dated this 1st day of July, 2016.

GENTILE CRISTALLI
MILLER ARMENI SAVARESE



VINCENT SAVARESE III
Nevada Bar No.: 2467
410 South Rampart Blvd., Suite 420
Las Vegas, Nevada 89145
(702) 880-0000
Attorneys for Appellant
Michael Joseph Jeffries

MEMORANDUM OF POINTS AND AUTHORITIES

1.

STATEMENT OF RELEVANT FACTS AND PROCEDURAL HISTORY

By Order of the Court, the Answering Brief of Respondent State of Nevada was due on March 14, 2016. On that date, the State filed a Motion for Enlargement of Time (First Request), (Document 2016-08005), requesting an additional 45 days, to and including April 28, 2016, within which to file Respondent's Answering Brief. Appended hereto and incorporated herein by reference as Exhibit "A." In support of that request, Respondent stated that it required additional time "to review the

appellate record and thoroughly brief Appellant's claims for this Court." Exhibit "A" p. 2, ¶ 3.

As is his practice, the undersigned counsel for Appellant did not oppose the State's request.

On March 21, 2016, this Court entered an Order, (Document 2016-08843), granting the State's first Motion for Enlargement of Time; giving the State until April 28, 2016 within which to file Respondent's Answering Brief. Appended hereto and incorporated herein by reference as Exhibit "B." However, in accordance with NRAP 31(b)(3)(B), the Court cautioned the State that "[g]iven the length of this initial extension request, no further extensions shall be permitted absent extraordinary circumstances and extreme need," and that "[f]ailure to timely file the answering brief may result in the imposition of sanctions." Exhibit "B." Indeed, that Rule provides, in pertinent part, that "[t]he court will grant an initial motion for extension of time for filing a brief only upon a clear showing of good cause. The court shall not grant additional extensions of time except upon a showing of extraordinary circumstances and extreme need."

On April 28, 2016, the State filed another Motion for Enlargement of Time (Second Request) (Document 2016-13405), requesting an additional 30 days, to and including June 1, 2016, within which to file Respondent's Answering Brief. Appended hereto and incorporated herein by reference as Exhibit "C." In support of

that request, the State asserted that “it has become apparent that the record and issues presented are more complex than originally anticipated,” (*id.* at p. 2 ¶ 3); and represented that Appellant’s Opening Brief implicated issues “that were not immediately apparent.” *Id.* at p. 2 ¶ 4.

Again, the undersigned counsel did not oppose the State’s request.

On May 11, 2016, this Court entered an Order, (Document 2016-14758), granting the State’s second Motion for Enlargement of Time; giving the State until June 1, 2016 within which to file Respondent’s Answering Brief. Appended hereto and incorporated herein by reference as Exhibit “D.” However, the Court therein again cautioned the State that “[a]ny additional extensions will be granted only on showing of extraordinary circumstances and extreme need,” and that “[f]ailure to timely file the answering brief may result in the imposition of sanctions.” Exhibit “D.”

On June 1, 2016, the State filed a third Motion for Enlargement of Time (Third Request) (Document 2016-17070); requesting to and including June 10, 2016 within which to file Respondent’s Answering Brief. Appended hereto and incorporated herein by reference as Exhibit “E.” In support of that request, Respondent represented that “[t]he State *needs to prepare a Respondent’s Appendix*,” (*id.* at p. 2 ¶ 3); and that, “[f]or 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." *Id.* (emphasis added). This third request was supported by a "declar[ation] under penalty of perjury" that this assertion was "true and correct," (*id.* at p. 2 ¶ 4); and the State's express assurance that this third request was "made in good faith and not for purposes of undue delay." *Id.*

The representations contained within the State's third Motion for Enlargement of Time necessarily insinuate a purported failure on the part of Appellant's counsel to comply with NRAP 30 by filing an under-inclusive Appellant's Appendix in this case. Thus, NRAP 30 (b)(4) provides, in pertinent part, that a respondent's appendix to an answering brief "may contain any transcripts or documents *which should have been but were not* included in the appellant's appendix"; and NRAP 30(g)(2) provides, in pertinent part, that "[i]f an appellant's appendix is so inadequate that justice cannot be done *without requiring inclusion of documents in the respondent's appendix which should have been in the appellant's appendix . . .* the court may impose monetary sanctions" (emphasis added).

However, notwithstanding these representations, the State has consistently observed in each of its respective motions for enlargement of time that Appellant filed "a 3-volume appendix consisting of approximately 705 pages." Exhibit "A" p. 2, ¶ 3; Exhibit "C" p. 2, ¶ 4; Exhibit "E" p. 2, ¶ 3. And indeed, Appellant did file a comprehensive Appellant's Appendix together with Appellant's Opening Brief,

which, Appellant submits, contains every conceivable transcript and document of record appropriate for inclusion in a joint or an appellant's appendix in this case under NRAP 30 without being over-inclusive.

Nevertheless, counsel for Appellant did not oppose the State's request, giving the benefit of the doubt to the State that counsel may have missed something.

However, sure enough, when, on June 10, 2016, the State finally filed its Answering Brief, *the State did not file a Respondent's Appendix*. Rather, each and every reference to the record contained within Respondent's Answering Brief *cites only Appellant's Appendix filed together with Appellant's Opening Brief on February 11, 2016*.

Appellant Jeffries is in custody pending the resolution of this appeal, and has been since March 26, 2015. Appellant's Appendix Vol. 3, p.680.

2.

LEGAL ARGUMENT

As this Court cautioned with abundant clarity in *Polk v. State*, 126 Nev. 180, 184-185, 233 P.3d 357, 359-360 (2010) (reconsideration *en banc* denied):

We previously stated that we “expect[] all appeals to be pursued with high standards of diligence, professionalism, and competence,” *Barry v. Lindner*, 119 Nev. 661, 671, 81 P.3d 537, 543 (2003), and that “‘[w]e intend to impress upon the members of the bar our resolve to end . . . lackadaisical [appellate] practices.’” *Id.* at 672, 81 P.3d at 544 (quoting *Smith v. Emery*, 109 Nev. 737, 743, 856 P.2d 1386, 1390 (1993)). NRAP 31(d) is a discretionary rule providing that if a respondent fails

to file an adequate response to an appeal, this court may preclude that respondent from participating at oral argument and consider the failure to respond as a confession of error. . . .

We have routinely invoked our discretion and enforced NRAP 31(d) when no answering brief has been filed. *See County Comm'rs v. Las Vegas Discount Golf*, 110 Nev. 567, 569–70, 875 P.2d 1045, 1046 (1994); *State of Rhode Island v. Prins*, 96 Nev. 565, 566, 613 P.2d 408, 409 (1980). We have also determined that a party confessed error when that party's answering brief effectively failed to address a significant issue raised in the appeal. *See Bates v. Chronister*, 100 Nev. 675, 681–82, 691 P.2d 865, 870 (1984) (treating the respondent's failure to respond to the appellant's argument as a confession of error); *A Minor v. Mineral Co. Juv. Dep't*, 95 Nev. 248, 249, 592 P.2d 172, 173 (1979) (determining that the answering brief was silent on the issue in question, resulting in a confession of error); *Moore v. State*, 93 Nev. 645, 647, 572 P.2d 216, 217 (1977) (concluding that even though the State acknowledged the issue on appeal, it failed to supply any analysis, legal or otherwise, to support its position and “effect[ively] filed no brief at all,” which constituted confession of error), *overruled on other grounds by Miller v. State*, 121 Nev. 92, 95–96, 110 P.3d 53, 56 (2005). We have also concluded that confession of error occurred when a respondent has inexcusably disregarded applicable appellate procedures or court orders. *See Walport v. Walport*, 98 Nev. 301, 302, 646 P.2d 1215, 1215 (1982) (treating the respondent's failure to comply with two orders from this court to obtain counsel and file a brief as a confession of error); *State, Dep't Mtr. Vehicles v. Palmer*, 96 Nev. 599, 600, 614 P.2d 5, 5 (1980) (determining that the respondent's failure to comply with a court order to file a brief or request an extension warranted treating respondent's conduct as a confession of error).

Indeed, in *County Comm'rs v. Las Vegas Discount Golf*, *supra*, 110 Nev. 567, 569–570, 875 P.2d 1045, 1046 (1994) this Court explained:

NRAP 31(c) empowers this court to deny a respondent the right to oral argument if respondent fails to file a timely answering brief, or the court may treat respondent's failure as "a confession of error" and make "appropriate disposition of the appeal" at that point. In *State Emp. Sec. Dep't v. Weber*, 100 Nev. 121, 124, 676 P.2d 1318, 1320 (1984), we warned that "in the future, when this court perceives a lack of regard for its rules or decisions, we may well impose sanctions such as striking a brief, dismissing an appeal, or finding a confession of error see also *Summa Corp. v. Brooks Rent-A-Car*, 95 Nev. 779, 602 P.2d 192 (1979) (treating failure to file an answering brief as a confession of error); *Melvin L. Lukins & Sons v. Kast*, 91 Nev. 116, 532 P.2d 602 (1975) (reversing judgment without considering the merits because respondent failed to file an answering brief); accord *Kitchen Factors, Inc. v. Brown*, 91 Nev. 308, 535 P.2d 677 (1975).

Respondent's failure to comply with the briefing schedule set by order of this court would be, in and of itself, sufficient grounds for this court to find a confession of error.

See also *State of Rhode Island v. Prins*, *supra*, 96 Nev. 565, 566, 613 P.2d 408, 409 (1980) (granting appellant's motion to "treat respondent's failure to timely file his brief as a confession of error").

Appellant submits that the instant circumstances demonstrate that the State's assertion that it "needed" to file a Respondent's Appendix in order to obtain a third enlargement of time, and its concomitant implicit accusation that Appellant's counsel failed to comply with the requirements of NRAP 30 were in fact both (1) false; and (2) either deliberately or recklessly made. They were therefore, by definition, made in bad faith, in order to procure the undue delay of this appeal. The State's Answering Brief should therefore be deemed to have been due on or before June

1, 2016, (Exhibit “D”); and therefore, not to have been timely filed, as a result of the wholly unfounded claim of “extraordinary circumstances and extreme need” asserted in the State’s third Motion for Enlargement of Time. And meaningful sanctions are both necessary and appropriate in order to address and deter the liberties taken by the State for the purpose of manipulating the appellate process in this case.

NRAP 28 (j) provides that briefs filed absent compliance with the rules of procedure “may be disregarded or stricken, on motion or *sua sponte* by the court.” And, as interpreted in the above-cited jurisprudence of this Court, NRAP 31 (d) (2) provides, in pertinent part, that “[i]f a respondent fails to [timely] file an answering brief, respondent will not be heard at oral argument except by permission of the court” and that “[t]he failure of respondent to [timely] file a brief may be treated by the court as a confession of error and appropriate disposition of the appeal thereafter made.” And here, because the State has purposefully seen fit to falsely accuse Appellant’s counsel of malfeasance in order to do so, Appellant submits that all three sanctions are called for. *A fortiori* where, as here, deliberate indifference to Appellant’s substantial liberty interests and the previous admonitions of the above-cited jurisprudence is shown.

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3.

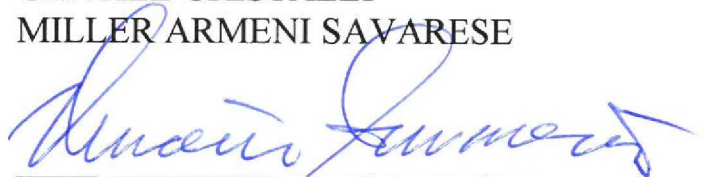
CONCLUSION

THEREFORE, for all the foregoing reasons, Appellant respectfully prays that this Court: (1) strike respondent's Answering Brief; and/or (2) preclude Respondent from being heard at oral argument; and/or (3) Deem Respondent to have confessed error and appropriate disposition of this appeal thereafter made, together with such other and further relief as the Court deems fair and just in the premises.

Dated this 1st day of July, 2016.

Respectfully submitted,

GENTILE CRISTALLI
MILLER ARMENI SAVARESE



VINCENT SAVARESE III
Nevada Bar No.: 2467
410 South Rampart Blvd., Suite 420
Las Vegas, Nevada 89145
(702) 880-0000
Attorneys for Appellant

CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on this 1st day of July, 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
100 North Carson Street
Carson City, NV 89701

Steven S. Owens
Chief Deputy District Attorney
Office of the Clark County District
Attorney
Regional Justice Center
200 Lewis Avenue
Las Vegas, Nevada 89155



An employee of Gentile Cristalli
Miller Armeni Savarese