

IN THE SUPREME COURT OF THE STATE OF NEVADA

TERRENCE KARYIAN BOWSER,

Appellant,

v.

THE STATE OF NEVADA,

Respondent.

Electronically Filed
Mar 10 2017 09:00 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

CASE NO: 71516

MOTION FOR ENLARGEMENT OF TIME

(First Request)

COMES NOW the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through his deputy, RYAN J. MACDONALD, 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 10th day of March, 2017.

Respectfully submitted,

STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565

BY /s/ Ryan J. MacDonald
RYAN J. MACDONALD
Deputy District Attorney
Nevada Bar #012615
Office of the Clark County District Attorney

MEMORANDUM

I, RYAN J. MACDONALD, 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 10, 2017. This is an appeal from a Judgment of Conviction. This Court may extend the time to file an Answering Brief upon a showing of good cause. NRAP 31(b)(3).

The State herein makes its first request for an enlargement of time. The State requests thirty (30) days from March 10, 2017, within which to file Respondent's Answering Brief. If granted, the new filing date for the State's Answering Brief would be April 10, 2017.

Appellant filed his Opening Brief on February 8, 2017, with an accompanying appendix of nearly 1,300 pages. Appellant's Opening Brief raises six issues and several sub-issues, involving detailed factual and legal inquiries. Therefore, the State requests additional time to thoroughly review the record and accurately respond to Appellant's claims. 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.

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Dated this 10th day of March, 2017.

Respectfully submitted,

STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565

BY */s/ Ryan J. MacDonald*

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CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on March 10, 2017. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

ADAM PAUL LAXALT
Nevada Attorney General

JAMIE J. RESCH, ESQ.
Counsel for Appellant

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Deputy District Attorney

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

RJM/Gerard Gosioco/jg