

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

TERRENCE KARYIAN BOWSER,

Appellant,

v.

THE STATE OF NEVADA,

Respondent.

Electronically Filed  
Apr 10 2017 09:30 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

CASE NO: 71516

**MOTION FOR ENLARGEMENT OF TIME**

**(Second 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 10<sup>th</sup> day of April, 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 April 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 second request for an enlargement of time. The State requests twenty days from April 10, 2017, within which to file Respondent's Answering Brief. If granted, the new filing date for the State's Answering Brief would be May 1, 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 for the first draft of Respondent's Answering Brief to go through our internal review process. 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 10<sup>th</sup> day of April, 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 April 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

RYAN J. MACDONALD  
Deputy District Attorney

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

RJM/Gerard Gosioco/jg