

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

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CHRISTOPHER SENA,  
Appellant,

v.

THE STATE OF NEVADA,  
Respondent.

Electronically Filed  
Nov 18 2020 11:57 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

CASE NO: 79036

**MOTION FOR LEAVE TO FILE RESPONDENT’S ANSWERING BRIEF  
IN EXCESS OF TYPE-VOLUME LIMITATIONS**

COMES NOW the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through his Chief Deputy, ALEXANDER CHEN, pursuant to NRAP 28(g) and the attached Declaration of Counsel, respectfully moves for leave to file an Respondent’s Answering Brief in Excess of Type-Volume Limitations pursuant to NRAP 32(a)(7)(D).

Dated this 18<sup>th</sup> day of November, 2020.

Respectfully submitted,

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

BY */s/ Alexander Chen*

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ALEXANDER CHEN  
Chief Deputy District Attorney  
Nevada Bar #010539  
Clark County District Attorney’s Office

**DECLARATION**  
(NRS 53.045)

I, ALEXANDER CHEN, am a duly licensed attorney in the State of Nevada and am employed by the Clark County District Attorney's Office.

Except by Court Order, a Respondent's Answering Brief shall not exceed 30 pages in length or shall contain no more than 14,000 words or 1,300 lines of text. NRAP 32(a)(7)(A)(i)-(ii); NRAP 32(a)(7)(D).

On May 20, 2020, Appellant filed a Motion for Leave to File Opening Brief in Excess of Type-Volume Limitation, requesting permission to file an Opening Brief an Excess of Type-Volume Limitation, as well as his Opening Brief containing 27,608 words. On June 4, 2020, this Court granted the motion. In order to fully develop the facts and answer the issues Appellant raised therein, it has been necessary to prepare an Answering Brief containing 55,975 words.

Appellant's Opening Brief is 133 pages and raises multiple issues in depth, including multiple constitutional issues and issues of first impression. Appellant's trial lasted 15 days, and the record is comprised of 29 volumes consisting of over 6,805 pages. The length of Appellant's Opening Brief necessitates a more detailed and lengthy response than the word limits of NRAP 32(a)(7) would normally permit. Respondent has diligently sought to respond in as concise a manner as possible, without sacrificing depth, breadth, or accuracy. See NRAP 32(a)(7)(A)(D)(i).

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated this 18<sup>th</sup> day of November, 2020.

Respectfully submitted,

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

BY */s/ Alexander Chen*

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ALEXANDER CHEN  
Chief Deputy District Attorney  
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Regional Justice Center  
200 Lewis Avenue  
Post Office Box 552212  
Las Vegas, Nevada 89155-2212  
(702) 671-2500

## CERTIFICATE OF COMPLIANCE

1. **I hereby certify** that this brief complies with the formatting requirements of NRAP 32(a)(4), the typeface requirements of NRAP 32(a)(5) and the type style requirements of NRAP 32(a)(6) because this brief has been prepared in a proportionally spaced typeface using Microsoft Word 2013 in 14 point font of the Times New Roman style.
2. **I further certify** that this brief is proportionately spaced, has a typeface of 14 points and contains 55,975 words and 4,634 lines of text pursuant to this Motion for Leave to File Respondent's Answering Brief in Excess of Type-Volume Limitations.
3. **Finally, I hereby certify** that I have read this appellate brief, and to the best of my knowledge, information, and belief, it is not frivolous or interposed for any improper purpose. I further certify that this brief complies with all applicable Nevada Rules of Appellate Procedure, in particular NRAP 28(e)(1), which requires every assertion in the brief regarding matters in the record to be supported by a reference to the page and volume number, if any, of the transcript or appendix where the matter relied on is to be found. I understand that I may be subject to sanctions in the event that the accompanying brief is not in conformity with the requirements of the Nevada Rules of Appellate Procedure.

Dated this 18th day of November, 2020.

Respectfully submitted

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

BY */s/ Alexander Chen*

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**CERTIFICATE OF SERVICE**

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on November 18, 2020. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

AARON D. FORD  
Nevada Attorney General

WILLIAM M. WATERS  
Chief Deputy Public Defender

ALEXANDER CHEN  
Chief Deputy District Attorney

*/s/ E. Davis*

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Employee, Clark County  
District Attorney's Office