1	IN THE SUPREME COURT OF THE STATE OF NEVADA
2	IN THE SOT REME COURT OF THE STATE OF MEVADA
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4	Electronically Filed
5	Apr 25 2011 11:36 a.m. EDWARD MICHAEL ADAMS, ) Case No. 554pacie K. Lindeman
6	Appellant,
7	v.
8	THE STATE OF NEVADA,
9	Respondent
10	MOTION FOR ENLARGEMENT OF TIME
11	(Second Request)
12	COMES NOW the State of Nevada, by DAVID ROGER, Clark County District
13	Attorney, through his deputy, NANCY A. BECKER, and moves this Court for an enlargement
14	of time. This motion is based on the following memorandum and all papers and pleadings on
15	file herein.
16	Dated this 25 <sup>th</sup> day of April, 2011.
17	DAVID ROGER Clark County District Attorney
18	Clark County District Attorney Nevada Bar # 002781
19 20	
20	BY /s/ Nancy A. Becker
21	NANCY A. BECKER Deputy District Attorney Nevada Bar #00145
22	
23 24	Office of the Clark County District Attorney 200 Lewis Avenue
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## **MEMORANDUM**

I, NANCY A. BECKER, am the supervising attorney in the above-captioned case. The State's Answering Brief is currently due on April 25, 2011. The State is requesting a THIRTY (30) day extension of time in which to file its Answering Brief, making it due on May 25, 2011. Pursuant to NRAP 31(b)(3), this Court for good cause shown can enlarge the time prescribed by the Nevada Rules of Appellate Procedure for the filing of an Answering Brief. As good cause for the extension in the instant case, the State cites the complexity of the issues presented. In particular, Appellant has raised a complex issue concerning redundancy and double jeopardy with regards to multiple counts of sexual assault. The State needs additional time to properly research and brief this issue. Moreover, Appellant has also raised several claims of prosecutorial misconduct, and the trial prosecutor requires additional time to review the briefing on this issue.

12 The certificate of service in Appellant's Opening Brief is dated February 22, 2011. 13 Appellant's Opening Brief is twenty (20) pages in length and raises issues and sub-issues 14 covering complex questions of trial court procedure and alleges instances of judicial error that 15 require a thorough review of the record. Appellant's Notice of Appeal was filed on February 22, 16 2010. Based on the foregoing, the State requires an additional THIRTY (30) days to fully 17 respond to this appeal. This is the State's second Motion for an Extension of Time in this matter. 18 Appellant was granted extensions of time on June 22, 2010, October 8, 2010, and December 13, 19 2010.

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DATED this 25<sup>th</sup> day of April, 2011.

Respectfully submitted,

DAVID ROGER, Clark County District Attorney

BY /s/ Nancy A. Becker

NANCY A. BECKER Deputy District Attorney Nevada Bar #000145

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1	CERTIFICATE OF SERVICE
2	I hereby certify and affirm that this document was filed electronically with the Nevada
3	Supreme Court on April 25, 2011. Electronic Service of the foregoing document shall be made
4	in accordance with the Master Service List as follows:
5	
6	CATHERINE CORTEZ MASTO Nevada Attorney General
7	P. DAVID WESTBROOK Deputy Public Defender
8	NANCY A. BECKER
9	Deputy District Attorney
10	
11	
12	
13	
14	
15	/s/ eileen davis Employee Clark County
16	Employee, Clark County District Attorney's Office
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26 27	NAB/Tyler Smith/ed
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28	3 I:\appellate\wpdocs\secretary\motions\extend\adams, edward michael,
	55494, RESP'S 2ND EXT.MTN.TO 5-25-11DOC