

IN THE SUPREME COURT OF THE STATE OF NEVADA

DEQUINCY BRASS,
Appellant,

v.

THE STATE OF NEVADA,
Respondent.

CASE NO:

Electronically Filed
Jun 04 2021 02:42 p.m.
Elizabeth A. Brown
Clerk of Supreme Court
81142

**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 Deputy, JOHN NIMAN, pursuant to NRAP 28(g) and the attached Declaration of Counsel, respectfully moves for leave to file a Respondent's Answering Brief in Excess of Type-Volume Limitations pursuant to NRAP 32(a)(7)(D).

Dated this 4th day of June, 2021.

Respectfully submitted,

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

BY */s/ John T. Niman*

JOHN T. NIMAN
Deputy District Attorney
Nevada Bar #014408
Office of the Clark County District Attorney
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200 Lewis Avenue
P.O. Box 552212
Las Vegas, Nevada 89155-2212
(702) 671-2500

DECLARATION
(NRS 53.045)

I, JOHN NIMAN, 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 January 26, 2021, 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 15,623 words. On January 29, 2021, 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 24,147 words.

Appellant's Opening Brief is 75 pages and raises 12 issues. 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).

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Dated this 4th day of June, 2021.

Respectfully submitted,

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

BY */s/ John T. Niman*

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CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on 4th day of June, 2021. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

AARON D. FORD
Nevada Attorney General

DEBORAH L. WESTBROOK
Chief Deputy Public Defender

JOHN T. NIMAN
Deputy District Attorney

/s/ J. Garcia

Employee, Clark County
District Attorney's Office

JTN/Julia Barker/jg