

ORIGINAL

IN THE SUPREME COURT OF THE STATE OF NEVADA

DALE EDWARD FLANAGAN,

Appellant,

v.

THE STATE OF NEVADA,

Respondent.

Case No. 40232

**FILED**

NOV 02 2005

**MOTION FOR LEAVE TO  
FILE 64 PAGE ANSWERING BRIEF**

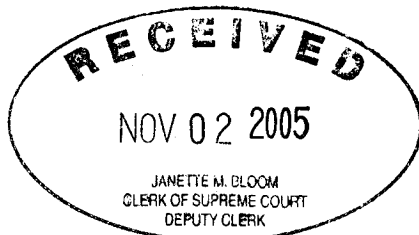
JANETTE M. BLOOM  
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CAL J. POTTER, III, ESQ.  
Potter Law Offices  
Nevada Bar No. 001988  
1125 Shadow Lane  
Las Vegas, Nevada 89102  
(702) 385-1954

DAVID ROGER  
Clark County District Attorney  
Nevada Bar #002781  
Clark County Courthouse  
200 South Third Street, Suite 701  
Post Office Box 552212  
Las Vegas, Nevada 89155-2212  
(702) 455-4711  
State of Nevada

ROBERT D. NEWELL, ESQ.  
Oregon State Bar No. 79091  
Davis Wright Tremain  
1300 S.W. Fifth Avenue  
Suite 2300  
Portland, Oregon 97201  
(503) 241-2300

BRIAN SANDOVAL  
Nevada Attorney General  
Nevada Bar No. 003805  
100 North Carson Street  
Carson City, Nevada 89701-4717  
(775) 684-1265



Counsel for Appellant

Counsel for Respondent

05-21585

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

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5 DALE EDWARD FLANAGAN, )

6 Appellant, )

7 v. )

Case No. 40232

8 THE STATE OF NEVADA, )

9 Respondent. )

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11 **MOTION FOR LEAVE TO**  
12 **FILE 64 PAGE ANSWERING BRIEF**

13 COMES NOW the State of Nevada, by DAVID ROGER, Clark County District  
14 Attorney, through his Chief Deputy, STEVEN S. OWENS, and submits this Motion  
15 For Leave To File 64 Page Answering Brief .

16 This motion is based on the following Declaration and all papers and pleadings  
17 on file herein.

18 Dated October 31, 2005.

19 Respectfully submitted,

20 DAVID ROGER  
21 Clark County District Attorney  
22 Nevada Bar # 002781

23 BY

24   
25 STEVEN S. OWENS  
26 Chief Deputy District Attorney  
27 Nevada Bar #004352

28 Attorney for Respondent

**DECLARATION**  
(NRS 53.045)

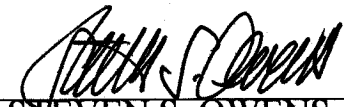
I, Steven S. Owens, am a duly licensed attorney in the State of Nevada and am employed by the Clark County District Attorney's Office.

I am the Chief Deputy District Attorney Capital Case Coordinator in the Criminal Appeals Division. In order to fully develop the facts and answer the issues raised in Appellant's 80 page Opening Brief, it has been necessary to prepare a 64 page Answering Brief.

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

Executed on October 31, 2005.

BY



STEVEN S. OWENS  
Chief Deputy District Attorney  
Nevada Bar #004352

Attorney for Respondent

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**Cal J. Potter, III, Esq.**  
**Potter Law Offices**  
**1125 Shadow Lane**  
**Las Vegas, Nevada 89012**

*Margie English*  
Employee, Clark County  
District Attorney's Office

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