

1 IN THE SUPREME COURT OF THE STATE OF NEVADA

2
3 ORIGINAL

FILED

JUL 07 2003

JANETTE M. BLOOM
CLERK OF SUPREME COURT
DEPUTY CLERK

5 MARLO THOMAS,

6 Appellant,

7 v.

8 THE STATE OF NEVADA,

9 Respondent.

Case No. 40248

10
11 **MOTION FOR LEAVE TO FILE**
12 **A 70 PAGE RESPONDENT'S ANSWERING BRIEF**

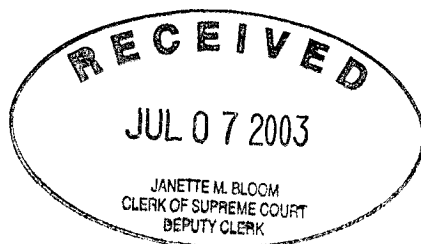
13 DAVID M. SCHIECK, ESQ.
14 Law Office of David M. Schieck
15 Nevada Bar #000824
16 302 East Carson Avenue
17 Suite 600
18 Las Vegas, Nevada 89101
19 (702) 382-1844

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

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

22 Counsel for Appellant

Counsel for Respondent



1 IN THE SUPREME COURT OF THE STATE OF NEVADA

2
3
4
5 MARLO THOMAS,)

6 Appellant,)

7 v.)

Case No. 40248

8 THE STATE OF NEVADA,)

9 Respondent.)

10
11 **MOTION FOR LEAVE TO FILE**
12 **A 70 PAGE RESPONDENT'S ANSWERING BRIEF**

13 COMES NOW the State of Nevada, by DAVID ROGER, Clark County District
14 Attorney, through his Chief Deputy, CLARK PETERSON, pursuant to NRAP 28(g)
15 and the attached Declaration of Counsel, respectfully moves for leave to file a 70 Page
16 Respondent's Answering Brief.

17 Dated this 2nd day of July, 2003.

18 Respectfully submitted,

19 DAVID ROGER
20 Clark County District Attorney
Nevada Bar # 002781

21
22 BY 

23 CLARK PETERSON
24 Chief Deputy District Attorney
Nevada Bar #006088

25 Attorney for Respondent
26
27
28

DECLARATION
(NRS 53.045)

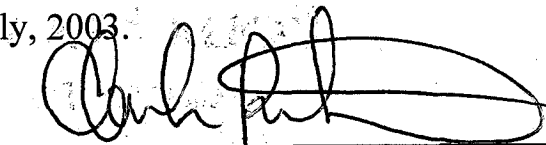
I, CLARK PETERSON, am a duly licensed attorney in the State of Nevada and am employed by the Clark County District Attorney's Office.

In order to fully develop the facts and answer the issues raised by the Defendant in his 74 page Opening Brief, it has been necessary to prepare a 70 page Respondent's Answering Brief.

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

Executed on this 2nd day of July, 2003.

BY

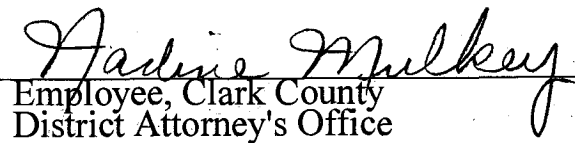


CLARK PETERSON
Chief Deputy District Attorney
Nevada Bar #006088

1 CERTIFICATE OF MAILING

2 I hereby certify and affirm that I mailed a copy of the foregoing Motion for
3 Leave to File a 70 Page Respondent's Answering Brief to the attorney of record listed
4 below on this 2nd day of July, 2003.

5
6 DAVID M. SCHIECK, ESQ.
7 Law Office of David M. Schieck
8 302 East Carson Avenue
9 Suite 600
10 Las Vegas, Nevada 89101

11 
12 Employee, Clark County
13 District Attorney's Office
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PETEc/Michael Yohay/mulkn