1	IN THE SUPREME COURT OF THE STATE OF NEVADA	
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4	Electronically Filed Apr 04 2012 08:58 a.r	n.
5	KIRSTIN BLAISE LOBATO, ) Case No. 58913 Tracie K. Lindeman Clerk of Supreme Col	urt
6	Appellant, {	
7	v. {	
8	THE STATE OF NEVADA,	
9	Respondent 5	
10 11		
12	MOTION FOR EXTENSION TIME	
13	COMES NOW the State of Nevada, by STEVEN B. WOLFSON, Clark	
14	County District Attorney, through his Chief Deputy, STEVEN S. OWENS, and	
15	moves this Court for an enlargement of time of thirty (30) days from April 4, 2012,	
16	making said brief due May 4, 2012. This motion is based on the following	
17	memorandum and all papers and pleadings on file herein.	
18	Dated this 4 <sup>th</sup> day of April, 2012.	
19	Respectfully submitted,	
20	STEVEN B. WOLFSON Clark County District Attorney	
21	Clark County District Attorney Nevada Bar # 001565	
22		
23	BY /s/ Steven S. Owens STEVEN S. OWENS	
24	Chief Deputy District Attorney Nevada Bar #004352	
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## **MEMORANDUM**

I, STEVEN OWENS, am the supervising attorney in the above-captioned case. This Court may extend the time to file an Answering Brief upon a clear showing of good cause. NRAP 31(b)(3)(B).

The State's Answering Brief on the instant matter is currently due April 4, 2012. Appellant's opening brief over one hundred thirty (130) pages and addresses seventy nine (79) claims from Appellant's Petition for Writ of Habeas Corpus filed in the district court. Appellant's appendix consists of eleven (11) volumes and over two thousand (2000) pages, which includes almost eight hundred (800) pages of trial transcript and Appellant's Petition, which is also almost eight hundred (800) pages. The issues presented are numerous and fact intensive, and the record is extensive. The State therefore submits good cause exists to extend the filing due date. The instant motion is the first request for an extension in this case.

Due to the above-described circumstances, Respondent respectfully requests this Court's permission for an extension of time of thirty (30) days to file its Answering Brief; making the Response due to be filed on or before Friday, May 4, 2012. This motion is made in good faith and not for purposes of undue delay.

I declare under penalty of perjury the factual representations set forth in the foregoing memorandum are true and correct.

Dated this 4<sup>th</sup> day of April, 2012.

Respectfully submitted,

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

BY /s/ Steven S. Owens

STEVEN S. OWENS
Chief Deputy District Attorney
Nevada Bar #004352
Office of the Clark County District Attorney
200 Lewis Avenue
Las Vegas, Nevada 89155-2212

## **CERTIFICATE OF SERVICE** I HEREBY CERTIFY AND AFFIRM that this document was filed electronically with the Nevada Supreme Court on April 4, 2012. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows: CATHERINE CORTEZ MASTO Nevada Attorney General TRAVIS N. BARRICK Counsel for Appellant STEVEN S. OWENS Chief Deputy District Attorney /s/ jennifer garcia Employee, Clark County District Attorney's Office SSO/Erika Wiborg/jg