

ORIGINAL

IN THE SUPREME COURT OF THE STATE OF NEVADA

1  
2  
3 THE STATE OF NEVADA, )  
4 )  
5 )  
6 )  
7 )  
8 )  
9 )  
10 )  
11 )  
12 )  
13 )  
14 )  
15 )  
16 )  
17 )  
18 )  
19 )  
20 )  
21 )  
22 )  
23 )  
24 )  
25 )  
26 )  
27 )  
28 )

Petitioner,

vs.

THE EIGHTH JUDICIAL DISTRICT COURT  
OF THE STATE OF NEVADA, IN AND FOR  
THE COUNTY OF CLARK, and THE  
HONORABLE MARK E. GIBBONS,  
DEPARTMENT VII OF THE EIGHTH  
JUDICIAL DISTRICT,

Respondents,

and

ALFRED P. CENTOFANTI, III,

Real Party in Interest.

Case No. 38987  
(Dist. Ct. No. C172534)

FILED

JAN -2 2002

JANETTE M. BLOOM  
CLERK OF SUPREME COURT  
BY *[Signature]*  
DEPUTY CLERK

RESPONSE TO PETITIONER'S EMERGENCY MOTION FOR STAY OF  
DISTRICT COURT PROCEEDINGS

COMES NOW, ALFRED P. CENTOFANTI, III, Real Party in  
Interest, by and through his attorneys, ALLEN R. BLOOM, ESQ., retained  
court counsel, PHILIP J. KOHN, Special Public Defender and GLORIA M.  
NAVARRO, Deputy Special Public Defender, local Nevada counsel, and  
respectfully opposes the Petitioner's Motion to Stay the Proceedings

// //

// //

// //

// //

RECEIVED

JAN 0'2 2002

JANETTE M. BLOOM  
CLERK OF SUPREME COURT  
DEPUTY CLERK

1 in the case styled State of Nevada vs. Centofanti, III, District Court  
2 Case C172534.

3 DATED this 28th day of December, 2001.

4 ALLEN R. BLOOM  
5 ATTORNEY AT LAW

6  
7 By  (sa)

1551 Fourth Avenue, Suite #801  
San Diego, California 92101-3156  
8 (619) 235-0508

9 PHILIP J. KOHN  
10 SPECIAL PUBLIC DEFENDER

11  
12 By  (pr)

GLORIA M. NAVARRO  
Deputy Special Public Defender  
13 Nevada Bar #5434  
14 309 South Third Street, 4th Floor  
Las Vegas, Nevada 89155  
15 (702) 455-6265

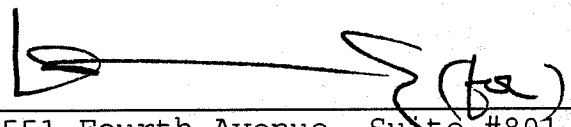
1 POINTS AND AUTHORITIES

2 Alfred P. Centofanti, III, Real Party in Interest,  
3 respectfully opposes Petitioner's request for a stay of the  
4 proceedings in District Court. Defendant, Alfred P. Centofanti, III,  
5 agrees with Judge Gibbons' ruling as stated in the transcription of  
6 the proceedings of December 27, 2001.

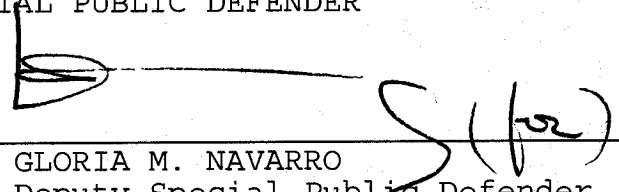
7 If this Honorable Court does issue an emergency stay, the  
8 Real Party in Interest requests an opportunity to file a proper and  
9 full response to the issues presented by the Petitioner.

10 Respectfully submitted,

11 ALLEN R. BLOOM  
12 ATTORNEY AT LAW

13 By   
14 1551 Fourth Avenue, Suite #801  
15 San Diego, California 92101-3156  
(619) 235-0508

16 PHILIP J. KOHN  
17 SPECIAL PUBLIC DEFENDER

18 By   
19 GLORIA M. NAVARRO  
20 Deputy Special Public Defender  
21 Nevada Bar #5434  
22 309 South Third Street, 4th Floor  
Las Vegas, Nevada 89155  
(702) 455-6265

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

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

Donna Pollock

STEWART L. BELL  
CLARK COUNTY DISTRICT ATTORNEY

By Mary English