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2007 MAR 13 PM 3:35

1 MICHAEL V. CRISTALLI, ESQ.
2 Nevada Bar No. 006266
3 CRISTALLI & SAGGESE, LTD.
4 732 South Sixth Street, #100
5 Las Vegas, Nevada 89101
6 (702) 386-2180

7 Attorney for Appellant

8 IN THE SUPREME COURT OF THE STATE OF NEVADA

9 ERICK M. BROWN,

10 Appellant,

11 V

12 STATE OF NEVADA,

13 Respondent.

APPEAL NO: 47856
CASE NO.: C189658
DEPT. NO.: XIV

FILED

MAR 15 2007

JANETTE M. BLOOM
CLERK OF SUPREME COURT
BY *S. Young*
DEPUTY CLERK

14 **MOTION FOR LEAVE TO FILE A 15 PAGE**
15 **FAST TRACK STATEMENT OF APPEAL AND 4 PAGE ERRATA TO FAST**
16 **TRACK STATEMENT BRINGING THE TOTAL PAGE LENGTH TO 15 PAGES**

17 Comes now Appellant, ERICK M. BROWN, by and through his counsel of
18 record, MICHAEL V. CRISTALLI, ESQ., and the attached Declaration of Counsel,
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MAR 15 2007

JANETTE M. BLOOM
CLERK OF SUPREME COURT
DEPUTY CLERK

07-06048

1 and respectfully requests leave to file a 15 page fast track statement of appeal, and
2 4 page errata to fast track statement, bringing the total page length to 15 pages.

3
4 Dated this 13th day of March, 2007.

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6 Respectfully submitted by:

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8
9 MICHAEL W. CRISTALLI, ESQ.
10 Nevada Bar No. 006266
11 CRISTALLI & SAGGESE, LTD.
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I have been retained to represent Appellant ERICK M. BROWN, in an appeal from a Judgement of Conviction entered on August 16, 2006.

That Appellant's defense includes the fact that another individual matched the description of the "taller" perpetrator; thus, the statement devoted significant page length to explaining the similarities and differences between Appellant and said third party.

That this case involved Appellant and a second perpetrator, wherein both identifications were questioned in detail, which also took up a significant amount of page length.

That a fast track appeal statement is the proper procedural course for this matter; however, because of the detail involved in explaining certain case law, and the detail involved in identification issues, the fast track statement exceeded the page length allotted.

That by removing the original statement of facts from the fast track statement, and supplementing said statement of facts with the statement of facts in the errata, the total page length of the fast track statement still totals 15 pages.

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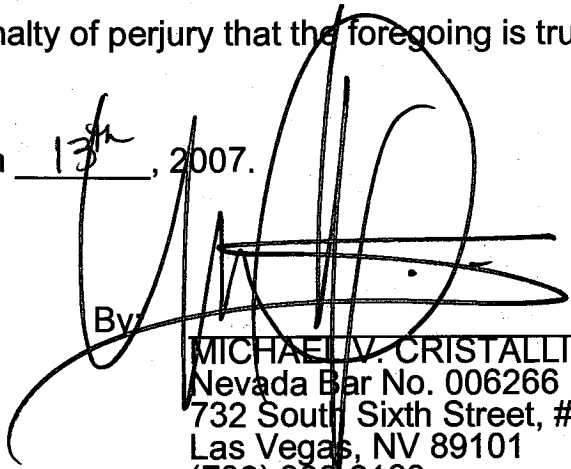
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As such, it is respectfully requested that the page limit be enlarged.

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

Executed on March 13th, 2007.

A large, stylized handwritten signature in black ink, appearing to read 'MICHAEL V. CRISTALLI', is written over the signature line and extends upwards into the text area.

By _____
MICHAEL V. CRISTALLI, ESQ.
Nevada Bar No. 006266
732 South Sixth Street, #100
Las Vegas, NV 89101
(702) 386-2180

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on the 13th day of March, 2007, I duly
3 deposited for mailing, postage prepaid, at Las Vegas, Nevada, a true and correct
4 copy of the above and foregoing,

5 **MOTION FOR LEAVE TO FILE A 15 PAGE**
6 **FAST TRACK STATEMENT AND 4 PAGE ERRATA TO FAST TRACK**
7 **STATEMENT, BRINGING THE TOTAL PAGE LENGTH TO 15 PAGES**

8 addressed to the following:

9 DAVID ROGER
10 DISTRICT ATTORNEY
200 LEWIS AVENUE
LAS VEGAS, NV 89101

11 CATHERINE CORTEZ MASTO, ESQ.
12 NEVADA ATTORNEY GENERAL
13 Criminal Justice Division
100 N. Carson
14 Carson City, Nevada 89701

15 and that there is regular communication between the place(s) of mailing and the
16 place(s) so addressed.

17 

18 An employee of
CRISTALLI & SAGGESE, LTD.