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~~Appellant,~~

THE STATE OF NEVADA,

Respondent.

Case No. Clerk of Supreme Court

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1 **DECLARATION OF SHARON G. DICKINSON**

2 1. I am an attorney licensed to practice law in the State of Nevada; I
3
4 am a deputy public defender assigned to handle the appeal of this matter; I am
5 familiar with the procedural history of this case.

6 2. This is my first request for a continuance. Previously the Court
7
8 granted a continuance for a court reporter.

9 3. As of today we are missing one transcript which is 12/14/10. The
10
11 minutes for 12/14/10 reflect the court asking the defendant to waive his right to
12
13 speedy trial by filing a written acknowledgment later. See Exhibit A. Our
14
15 secretary is calling the court reporter today to determine what happened to the
16
17 transcript. Our secretary also informed me that she was not able to find the written
18
19 acknowledgement mentioned in the 12/14/10 minutes. Although I thought I could
20
21 finish the Fast Track and include the missing transcript later, I decided to talk to
22
23 the trial attorney about this particular hearing and the case in general. However, I
24
25 learned that the trial attorney is out of the office until 04/08/13.

26 4. Additionally, I did not have time to complete the Fast Track
27
28 Statement because of other cases I needed to complete. I completed Turner v.
29
30 State, Case No. 62461, and submitted the Turner Fast Track Statement on
31
32 03/27/13. I filed a motion requesting full briefing in the Turner case on 03/28/13.
33
34 I also needed to finish the Petition for Rehearing in the case of Gardner v. State,
35
36 Case No. 60568, which is being filed today.

1 5. I spoke to Mr. Barber and he agreed to a 3 week continuance of his
2 appeal.
3

4 6. This Motion for Extension is made in good faith and not for the
5 purpose of delay.

6 I declare under penalty of perjury that the foregoing is true and
7 correct.
8

9 EXECUTED on the 1st day of April, 2013.

10
11 
12 SHARON G. DICKINSON

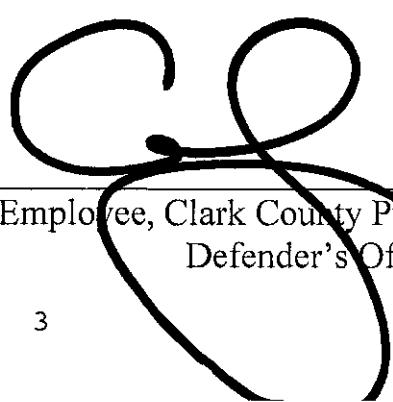
13 **CERTIFICATE OF SERVICE**

14 I hereby certify that this document was filed electronically with the
15 Nevada Supreme Court on the 1st day of April, 2013. Electronic Service of the
16 foregoing document shall be made in accordance with the Master Service List as
17 follows:
18

19
20 CATHERINE CORTEZ MASTO
21 STEVEN S. OWENS

SHARON G. DICKINSON
HOWARD S. BROOKS

22 I further certify that I served a copy of this document by mailing a
23 true and correct copy thereof, postage pre-paid, addressed to: JAQUEZ DEJUAN
24 BARBER, NDOC No: 1039024, c/o High Desert State Prison, P.O. Box 650,
25 Indian Springs, NV 89070.
26

27
28 BY 
Employee, Clark County Public
Defender's Office

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EXHIBIT A

DISTRICT COURT
CLARK COUNTY, NEVADA

Felony/Gross Misdemeanor

COURT MINUTES

December 14, 2010

C-10-268471-1 State of Nevada
vs
Jaquez Barber

December 14, 2010 9:00 AM Motion to Continue

HEARD BY: Hardcastle, Kathy

COURTROOM: RJC Courtroom 10D

COURT CLERK: Denise Trujillo; Sara Richardson/sr; Tiffany Lawrence; Sharon Coffman; Monique Alberto

RECORDER: Lara Corcoran

REPORTER:

PARTIES

PRESENT: Romney, Claudia L., P.D. Attorney for Defendant
Westmeyer, Daniel Attorney for State

JOURNAL ENTRIES

- Deft. not present. Ms. Romney advised she has another firm trial setting at the same time and represented that Deft. will waive his right to a trial within 60 days. COURT ORDERED, MOTION GRANTED; trial date reset. Court directed Ms. Romney to provide a written waiver from Deft.

CUSTODY

3/15/11 9:00 A.M. CALENDAR CALL

3/21/11 10:00 A.M. JURY TRIAL