

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

Respondent.

Electronically Filed
Apr 22 2013 02:15 p.m.
Tracie K. Lindeman
Clerk of Supreme Court
No. 02-2649

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Docket 62649 Document 2013-11779

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 second request for a continuance. Previously the Court
7
8 granted a continuance for a court reporter.

9 3. Since my last request for a continuance we received the missing
10 transcript of 12/14/10. Also, I spoke to the trial attorney and learned that the
11 defense attorney never filed a written acknowledgment or waiver of the
12 defendant's right to a speedy trial as requested by the court on 12/14/10. I further
13
14 learned that the defendant was initially brought to juvenile court on this case on or
15 about 03/05/09. Thus, the delay in the speedy trial was significant and I will need
16
17 to review the juvenile file to determine the length of the delay.

18 4. Mr. Barber's defense counsel in juvenile court informed me that I
19
20 need to make an appointment with her to review the Mr. Barber's file.
21
22 Apparently, even though I am Mr. Barber's attorney, I am not allowed to view it
23
24 on my own. Thus, I need an extension to set aside time to look at his file and
25 decide what, if any, portions of his file are relevant for his current case. I also
26 decided to order the transcript of his certification hearing because his attorney
27
28 indicated he waived the hearing.

1 5. Mr. Barber called me twice in the past 2 weeks. He informed me
2 that he read the transcripts that I sent him and that some of them are incorrect. Mr.
3 Barber said that some of the transcripts inaccurately reflect what he said and in
4 other transcripts his statements to the court are incomplete. I asked him to write
5 down and send me a list of all the mistakes he found in the transcripts. Once I
6 receive his information, I will need to speak to the court reporter or recorder to
7 confirm the mistakes and request changes if the transcripts I currently have are
8 inaccurate.

12 6. I informed Mr. Barber that it may take me at least 60 days to
13 review the errors and change them if they are truly errors. Mr. Barber has no
14 objection to a continuance of the filing of his Fast Track Statement.

16 7. Based on the above, I am asking for an extension of 65 days
17 within which to complete Mr. Barber's Fast Track Statement. During the time
18 period that I am working on his appeal, I will be out of the office for one week in
19 May and therefore need additional time.

22 8. This Motion for Extension is made in good faith and not for the
23 purpose of delay.

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

27 EXECUTED on the 22nd day of April, 2013.

28 
SHARON G. DICKINSON

- 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

CATHERINE CORTEZ MASTO
STEVEN S. OWENS

SHARON G. DICKINSON
HOWARD S. BROOKS

BY

Employee, Clark County Public
Defender's Office