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Electronically Filed
Aug 05 2013 09:38 a.m.
Case No. 13-00041
Tracie K. Lindeman
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 handling the appeal of the conviction in this case; I
5 am familiar with the procedural history of this case.
6

7 2. Yesterday I received additional documents and information from
8 Mr. Barber's juvenile attorney. The new information led me to believe that full
9 briefing is warranted so that the waiver, certification, speedy trial, and arrest
10 warrant issues may be more thoroughly developed. Many of these issues are
11 issues of first impression. Although Mr. Barber's attorney did not object to the
12 court violating NRS 62D.310, it may be reviewed under the plain error doctrine.
13 Also, even though Mr. Barber waived the certification hearing, the waiver may be
14 reviewed under plain error.
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18 3. On July 31, 2013, I spoke to the juvenile attorney who handled Mr.
19 Barber's case because the file stamp on the petition was not legible. She requested
20 a clear copy from the clerk's office which we received on August 1, 2013. Exhibit
21 B:700. Prior to this, the juvenile attorney did not know the date the petition was
22 filed because of the illegible stamp. She also sent me copies of the minutes.
23
24

25 4. I respectfully ask that this appeal be deemed a regular criminal
26 appeal and not a Fast Track Appeal. I respectfully ask that Rule 3C not apply to
27 this appeal.
28

5. Therefore, I am asking for an extension of time to allow this Honorable Court time to decide on the Motion for Full Briefing.

6. This motion is made in good faith and not merely for any purpose of delay.

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

EXECUTED on the 2nd day of August, 2013.

Sharon Dickinson
SHARON G. DICKINSON

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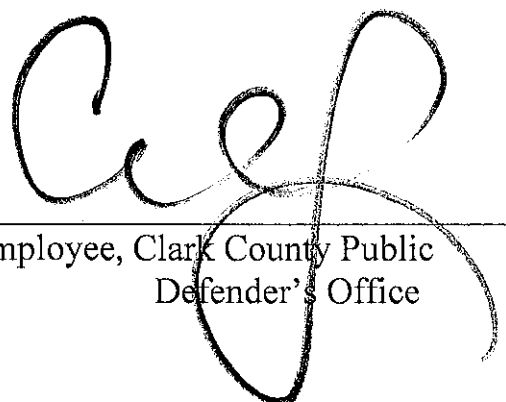
CERTIFICATE OF SERVICE

I hereby certify that this document was filed electronically with the Nevada Supreme Court on the 2nd day of August, 2013. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

CATHERINE CORTEZ MASTO	SHARON G. DICKINSON
STEVEN S. OWENS	HOWARD S. BROOKS

I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage pre-paid, addressed to:

JAQUEZ DEJUAN BARBER
NDOC No. 1039024
c/o High Desert State Prison
P.O. Box 650
Indian Springs, NV 89018

BY 
Employee, Clark County Public
Defender's Office