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Respondent.

APPELLANT'S MOTION FOR ONE DAY EXTENSION OF TIME
TO FILE OPENING BRIEF

Comes Now Appellant JAQUEZ DEJUAN BARBER, by and through Deputy Public Defender SHARON G. DICKINSON, and moves for a one (1) day extension of time from Tuesday, September 10, 2013 through and including Wednesday, September 11, 2013 within which to file the Opening Brief in this case. This Motion is based upon the attached Declaration of counsel.

DATED this 10th day of September, 2013.

PHILIP J. KOHN
CLARK COUNTY PUBLIC DEFENDER

By Sharon Dickinson
SHARON G. DICKINSON, #3710
Deputy Public Defender

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

7 2. Yesterday I sought a one day extension to complete the Opening
8 Brief due to illness. Although I thought I was on the road to a quick recovery, I
9 was incorrect. Thus, I did not get as much completed on the brief as I anticipated
10 yesterday and today. At the present time I only have two sections of the 9 issue
11 brief to finish and I have some additional research to complete for one of the
12 sections. The brief could be completed in the next hour but our secretary is unable
13 to stay at work any longer because she needs to pick up her child at daycare.
14 Thus, there is no one who can complete the indexing that is required and file the
15 Opening Brief. However, we have already filed the appendix. For this reasons, I
16 am requesting another one day extension.
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21 3. This Motion for Extension is made in good faith and not for the
22 purpose of delay.

23 I declare under penalty of perjury that the foregoing is true and
24 correct.
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26 EXECUTED on the 10th day of September, 2013.

27 
28 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 10th day of September, 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 89070.

BY /s/ Carrie M. Connolly
Employee, Clark County Public
Defender's Office