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Respondent.

Docket 62649 Document 2014-02616

1 **DECLARATION OF SHARON G. DICKINSON**

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

6 2. On December 13, 2013, I filed a Stipulation to continue the
7
8 Reply Brief which was granted making the Reply Brief due today, January
9 24, 2014. This is my first request for an extension, other than the
10 stipulation.
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12 3. I am asking for a brief extension to allow additional time for
13
14 further research of the issues in response to the State's Answering Brief.
15 The State's Answering Brief is unusually lengthy, containing 55 pages and
16 13,614 words. I need additional time: (1) to research and adequately
17 discuss the arguments submitted by the State; and, (2) to document and
18 correct the misstatements of the facts within the Answering Brief. Also, I
19 am in the process of preparing a Reply Appendix. Because of a "smell
20 problem" in our office today due to a broken sewer or other type of pipe in
21 the street, I thought it would be better to wait until next week to have the
22 clerks to prepare the Reply Appendix.
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26 4. Another reason for my request for an extension is because I
27
28 was only able to begin working on the Reply this week due to injuries and

1 illness and other cases that took up my time in December and January. On
2 November 30, 2013, I suffered a burn to my left hand that required the hand
3 to be wrapped for approximately two weeks. This injury made it difficult to
4 type and I had difficulty turning the pages in an appendix. Subsequently I
5 had a sinus infection that became bronchitis. Just when I thought I was
6 almost over the bronchitis, at the beginning of January, I came down with a
7 low grade fever, chills, and another infection. Thus, due to health issues, I
8 was unable to work on the Reply Brief any sooner. However, I prepared a
9 Reply Brief in Randolph v. State, case no. 60993, filed on 01/03/14, and a
10 Reply Brief in Turner v. State, case no 62461, submitted on 01/17/14.
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15 5. This Motion for Extension is made in good faith and not for
16 the purpose of delay.
17

18 I declare under penalty of perjury that the foregoing is true and
19 correct.
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21 EXECUTED on the 24th day of January, 2014.

22 /s/ Sharon G. Dickinson
23 SHARON G. DICKINSON
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