1	IN THE SUPREME COURT OF THE STATE OF NEVADA
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4	JAQUEZ DEJUAN BARBER, ) Electronically Filed
5	Appellant, June 2014 10:15 a.m.
6	) Case NOIERO Supreme Court vs.
7	) .
8	THE STATE OF NEVADA, )
9 10	Respondent.
10 11	()
11	APPELLANT'S MOTION FOR EXTENSION OF TIME
12	TO FILE REPLY BRIEF
14	Comes Now Appellant JAQUEZ DEJUAN BARBER, by and
15	through Deputy Public Defender SHARON G. DICKINSON, and moves for a one
16	(1) day extension (business days) of time from Tuesday, January 28, 2014 through
17	(1) day extension (business days) of time from ruesday, sandary 20, 2014 through
18	and including Wednesday, January 29, 2014, within which to file the Reply Brief
19	in this case. This Motion is based upon the attached Declaration of counsel.
20	DATED this 28 <sup>th</sup> day of January, 2014.
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22	PHILIP J. KOHN CLARK COUNTY PUBLIC DEFENDER
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24 2 <i>1</i>	
25	By <i>/s/ Sharon G. Dickinson</i>
26 27	SHARON G. DICKINSON, #3710 Deputy Public Defender
27 28	Deputy i ubite Detender
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## **DECLARATION OF SHARON G. DICKINSON**

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

2. On December 13, 2013, I filed a Stipulation to continue the Reply
Brief which was granted making the Reply Brief due January 24, 2014. On
January 24, 2014, I asked for a two day extension (two business days) to allow for
additional time to adequately research and write the Reply. I am now asking for a
one day extension.

3. I am asking for a brief extension of one day to allow additional 14 time for further research of the issues in response to the State's Answering Brief. 15 16 As previously discussed, the State's Answering Brief is unusually lengthy, 17containing 55 pages and 13,614 words. I have found an unusual amount of 18 19 misstatements of facts within the arguments and the Statement of Facts which 20 required additional attention, a problem that I do not encounter in most briefs. 21 Also, in some instances, the State did not address any cases I cited or complained 22 23 that the arguments I presented did not need to be addressed. This approach by the 24 State made a response to the Answering Brief more difficult. In one issue, the 25 26 State ignored many of the facts that were unfavorable for the State, leaving me to 27document the State's omissions. Thus, the research and writing of the Reply is 28

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1	taking longer than I expected when I asked for an extension last week. However,
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3	our clerk has prepared the Reply Appendix which I began referencing the
4	appendix today. Although I only have two issues remaining to complete, our
5	secretary needs to leave by 6:00 p.m. because her daughter is ill. Our secretary
6 7	indicates that she will be taking her daughter to the doctor tomorrow but she
8	anticipates she will be in the office in the afternoon and will complete, finalize,
9	
10	and file the Reply Brief tomorrow.
11	4. Another reason for my request for an extension is because when I
12	previously asked for a two day extension (two business days) I planned on
13 14	working the entire weekend on the Reply. However, I judged college mock trial at
15	UNLV all day Saturday.
16	5. This Motion for Extension is made in good faith and not for the
17	
18	purpose of delay.
19 20	I declare under penalty of perjury that the foregoing is true and
20 21	correct.
22	EXECUTED on the 28 <sup>th</sup> day of January, 2014.
23	/s/ Sharon G. Dickinson
24	SHARON G. DICKINSON
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2	CERTIFICATE OF SERVICE
3	I hereby certify that this document was filed electronically with the
4	Nevada Supreme Court on the 28 <sup>th</sup> day of January, 2014. Electronic Service of the
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6 7	foregoing document shall be made in accordance with the Master Service List as
8	follows:
9	CATHERINE CORTEZ MASTO SHARON G. DICKINSON STEVEN S. OWENS HOWARD S. BROOKS
10	
11	I further certify that I served a copy of this document by mailing a
12	true and correct copy thereof, postage pre-paid, addressed to: JAQUEZ DEJUAN
13 14	BARBER, NDOC No: 1039024, c/o High Desert State Prison, P.O. Box 650,
15	Indian Springs, NV 89070.
16	BY /s/ Carrie M. Connolly
17	Employee, Clark County Public
18	Defender's Office
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