

EVARISTO GARCIA

VS.

Respondent.

Electronically Filed
Mar 17 2014 11:00 a.m.
Tracie K. Lindeman
Clerk of Supreme Court

Docket 64221 Document 2014-08507

DECLARATION OF COUNSEL

ROSS C. GOODMAN, ESQ.

STATE OF NEVADA)
) ss.
COUNTY OF CLARK)

ROSS C. GOODMAN, ESQ., upon information and belief, declares and says:

1. That Declarant is an attorney duly licensed to practice law in the State of Nevada and was trial counsel and is NRAP 3C(b)(2) appointed appellate counsel for EVARISTO GARCIA in the present case. Declarant was trial counsel in a protracted trial that involved numerous complex issues and rulings mid-trial that impact the outcome as well as matters heard prior to the dispositive ruling which in essence struck portions of the State's case..

2. Declarant previously had stipulated with the Respondent to an extension of time request which was granted extending the time to file the instant Opening Brief to March 14, 2014.

3. That the matter is obviously complicated meriting full briefing and that the time requested in this request is to make sure the appeal is perfected and that issues are presented in an appropriate manner for just adjudication. That absent unforeseeable or unexpected circumstances, Declarant will comply with the request to extend the Opening Brief, sixty (60) days to and including May 14, 2014, and not request additional time. The somewhat lengthy Appendix is also being assembled necessitating this request.

4. This specific request for extension of time is therefore sought out of necessity only and not made for purposes of delay.

FURTHER YOUR DECLARANT SAYETH NAUGHT.

/s/ Ross C. Goodman, Esq.
ROSS C. GOODMAN, ESQ.

CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on the 14th day of March, 2014. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Steven Wolfson
Steven Owens
Clark County District Attorney

Catherine Cortez Masto
Nevada Attorney General

/s/ Ross C. Goodman, Esq.