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Tracie K. Lindeman
Clerk of Supreme Court

5 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

6 RONALD ERNEST LAKEMAN,) **Supreme Court No. 64609**
7) District Court Case: C265107
8 Appellant,)
9 vs.)
10 THE STATE OF NEVADA,)
11 Respondent.)

12 **MOTION TO EXTEND TIME TO FILE FAST TRACK STATEMENT**

13
14 Comes now, Frederick A. Santacroce, Esq., counsel for Appellant, Ronald Lakeman, and
15 moves this Court for an Order granting an extension of ninety (90) days for the filing of the Fast
16 Track Statement.

17 This Motion is made and based upon NRAP 3C(2), the affidavit of Frederick A. Santacroce,
18 Esq., filed herewith, and the points and Authorities herein.

19 Dated this 17th day of January, 2014.

20 /s/ Frederick A. Santacroce

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1 **POINTS AND AUTHORITIES**

2 NRAP 3C(2) states:

3 **(2) Fast Track Statement and Response; Supplemental Statement and**
4 **Response.**

5 **(A) Five-Day Telephonic Extension.** Counsel may request by
6 telephone a 5-day extension of time for filing fast track statements and responses,
7 and supplemental fast track statements and responses. If good cause is shown, the
8 clerk of the Supreme Court may grant the request by telephone or by written order
9 of the clerk.

10 **(B) Additional Extensions by Motion.** Subsequent extensions of time
11 for filing fast track statements and responses, and supplemental fast track
12 statements and responses shall be granted only upon motion to the Supreme
13 Court. The motion shall justify the requested extension in light of the time limits
14 provided in this Rule, and shall specify the exact length of the extension
15 requested. Extensions of time for the filing of fast track statements and responses,
16 and supplemental fast track statements and responses shall be granted only upon
17 demonstration of extreme need or merit. Sanctions may be imposed if a motion is
18 brought without reasonable grounds.

19 This is the first request for an extension of time to file the Fast Track Statement. On
20 December 17, 2013, the rough draft transcript was order. Mr. Santacroce has been informed by the
21 court reporter that given the length of the trial the rough draft transcript will not be available until
22 late February. It is essential that Mr. Santacroce have the rough draft transcript when preparing the
23 Fast Track Statement. Therefore, counsel for the Appellant respectfully requests that he be granted
24 an additional ninety (90) days to file the Fast Track Statement.

25 Dated this 17th day of January, 2014.

26 /s/ Frederick A. Santacroce

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1 **AFFIDAVIT OF FREDERICK A. SANTACROCE IN SUPPORT OF**
2 **MOTION FOR EXTENSION OF TIME TO FILE FAST TRACK STATEMENT**

3 I, Frederick A. Santacroce, under penalty of perjury declares as follows:

4 1. I am an attorney duly licensed to practice law in the State of Nevada. I am counsel for the
5 Appellant, Ronald Lakeman, in the above-entitled matter. I have personal knowledge of all matters
6 contained herein and am competent to testify thereto.

7 2. This is the first request for an extension of time to file the Fast Track Statement. On
8 December 17, 2013, the rough draft transcript was order. I have been informed by the court reporter
9 that given the length of the trial the rough draft transcript will not be available until late February. It
10 is essential that I have the rough draft transcript when preparing the Fast Track Statement.
11 Therefore, I respectfully requests that I be granted an additional ninety (90) days to file the Fast
12 Track Statement

13 3. That this motion is made in good faith and not for purposes of delay.

14
15 Executed this 17th day of January, 2014.

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17 /s/ Frederick A. Santacroce
18 FREDERICK A. SANTACROCE
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