



**DECLARATION OF SHARON G. DICKINSON**

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2           1. I am an attorney licensed to practice law in the State of Nevada; I am a deputy  
3 public defender assigned to handle the appeal of this matter; I am familiar with the procedural  
4 history of this case.  
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6           2. On 06/18/14, at the time of Mr. Washington's sentencing, his private counsel  
7 withdrew and the Clark County Public Defender's Office was directed to handle his appeal. On  
8 06/27/14, the court filed the Judgment.

9           3. Two notices of appeal were filed: (1) on 06/30/14, Mr. Washington filed a pro  
10 per notice of appeal in district court, and (2) on 07/17/14, our office filed a notice of appeal.  
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12           4. The Opening Brief was originally due on 11/17/14 but a continuance by way  
13 of stipulation was granted, making the Opening Brief due today.

14           5. Although the appendix is prepared in part, I have not had time to read the  
15 appendix in this case for several reasons. First, during October I injured by right arm and  
16 shoulder, requiring medical attention and treatment for pain. During the weeks of 10/19/14 and  
17 10/26/14, I had limited use of my right arm and hand, making it difficult to type for extended  
18 periods. Although most of the pain subsided by the end of November, I continue to experience  
19 discomfort and mild soreness after typing for long periods. Additionally, during November my  
20 mother-in-law became ill and passed on 11/29/14. Her service was out-of-town. I took off time  
21 last week to travel and get things ready for the memorial.  
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23           6. I also experienced problems in obtaining Mr. Washington's entire file from his  
24 private attorney. At sentencing, private counsel gave our deputy a thumb drive that only  
25 contained pictures and no files. I have a box of approximately 300 pictures from the one thumb  
26 drive. Thus our office obtained the remaining documents at a later date. After receiving the  
27 second thumb drive, our office printed out approximately 150 or more pages of documents. At  
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1 trial there were almost 300 exhibits introduced during the trial and penalty phase. I did not learn  
2 that we received a copy of the entire file from private counsel until approximately 40 days ago.

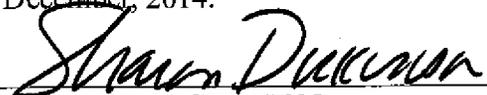
3           7. This was a 9 day trial and the appendix currently contains 2055 pages, without  
4 any exhibits added. Prior to trial, the prosecutor told the court she planned on calling 40  
5 witnesses. However, a quick review of the appendix indicates approximately 23 witnesses  
6 testified. This case involved two trials and one penalty hearing for one murder count. The  
7 second trial was a case of possession of a firearm by an ex-felon.

8           8. In asking for a 60 day extension, I am taking into account all the cases I need  
9 to complete and the fact I have had no contact with Mr. Washington. Although I have written  
10 him, he has yet to contact me. I have had contact with a family member. Because of my injury,  
11 I continued several other cases that need to be completed before I begin working on his.

12           9. This Motion for Extension is made in good faith and not for the purpose of  
13 delay.

14           I declare under penalty of perjury that the foregoing is true and correct.

15           EXECUTED on the 18<sup>th</sup> day of December, 2014.

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20           SHARON G. DICKINSON

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