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Respondent.

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1 **DECLARATION OF SHARON G. DICKINSON**

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

6 2. On 06/18/14, at the time of Mr. Washington's sentencing, his
7
8 private counsel withdrew and the Clark County Public Defender's Office was
9
10 directed to handle his appeal. On 06/27/14, the court filed the Judgment. The
11
12 Opening Brief was initially due on 11/17/14 but a continuance by way of
13
14 stipulation was granted, making the Opening Brief due 12/18/14.

15 3. After being assigned to represent Mr. Washington, our office did
16
17 not obtain his entire file from his private counsel until after 12/18/14 – after the
18
19 second due date for the Opening Brief.

20 4. This was a 9 day trial and the appendix currently contains 2055
21
22 pages, without any exhibits added. Almost 300 exhibits were introduced during
23
24 the trial and penalty hearing. Approximately 23 witnesses testified. This case
25
26 involved two trials and one penalty hearing for one murder count. The second trial
27
28 was a case of possession of a firearm by an ex-felon.

 5. In February of 2015, this Court granted an 80 day extension. I
visited Mr. Washington on 02/17/15 at the prison and begin talking to him about
his case. However, after we set times for him to call, the prison moved him. He
was not able to get a call through to me until the beginning of April. I then set a

1 time for him to call me on April 3rd but never received the call. Thus, I still need
2 to discuss his case with him and because we are having trouble communication I
3 need additional time. Mr. Washington is no longer housed near Las Vegas so I
4 need to rely on communicating with him by telephone.
5

6
7 6. Since February I have also been busy with numerous other cases
8 that have taken my time. Between 02/04/15 and today I filed the following: (1)
9 Perez v. State, Case No. 66598, Opening Brief filed on 02/11/15; (2) Vergara-
10 Martinez v. State, Case No. 65853, Opening Brief filed on 02/23/15 and Petition
11 for En Banc Reconsideration filed on 04/02/15; (3) Randolph v. State, Case No.
12 60993, Petition for Rehearing filed on 02/18/15 and Petition for En Banc
13 Reconsideration filed on 04/02/15; (4) Cook v. State, Case No. 64744, Opening
14 Brief filed on 03/10/15; (5) Turner v. State, Case No. 62461, Answer to Petition
15 for En Banc Reconsideration filed on 03/23/15; (6) Afzali v. State, Case No.
16 54019, Supplemental Opening Brief on Issue I filed on 03/18/15; (7) Cruz –Garcia
17 v. State, Case No. 67166, Motion to Consolidate filed on 03/27/15 and Reply filed
18 on 03/31/15; and (10) Gardner v. State, Case No. 66385 filed on 04/10/15.
19 Additionally, I presented oral argument in Marin v. State, Case No.63571 on
20 02/11/15 and Barber v. State, Case No. 62649 on 02/12/15.
21

22
23 5. In March of 2015, I began experiencing a health problem with my eyes.
24 What I thought was mere eye strain from reading and working turned out to be
25 more serious. On 03/17/15 and 04/14/15, I saw an eye doctor. Because I did not
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27
28

1 correctly take the medication the first time, when I went back to the doctor on
2 04/14/15, the problem was still there. I am unable to read for long periods of time
3 because of the medication and need to take breaks during the process. Thus, my
4 ability to continue working on cases is significantly diminished. It may be another
5 week and a half or longer before the medical problem is cured. If the court needs
6 medical records I will provide them to the court under seal.
7

8
9 6. Based on the above, I am asking for a 40 day extension. In asking
10 for this time, I am taking into account the numerous other cases also demanding
11 my attention which I need to complete and the fact I have had little contact with
12 Mr. Washington after receiving his case from his private attorney. I am also
13 taking into consideration the health problem with my eyes.
14

15
16 7. I am confident that Mr. Washington has no objection to a
17 continuance. Mr. Washington is a 24-year-old who will be spending the rest of his
18 life in prison and therefore he wants me to spend time going over his case with
19 him and he wants me to be effective in my representation.
20

21
22 8. This Motion for Extension is made in good faith and not for the
23 purpose of delay.
24

25 I declare under penalty of perjury that the foregoing is true and
26 correct.
27

28 EXECUTED on the 20th day of April, 2015.

/s/ Sharon G. Dickinson
SHARON G. DICKINSON

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CERTIFICATE OF SERVICE

I hereby certify that this document was filed electronically with the Nevada Supreme Court on the 20th day of April, 2015. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

CATHERINE CORTEZ MASTO	SHARON G. DICKINSON
STEVEN S. OWENS	HOWARD S. BROOKS

I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage pre-paid, addressed to:

MATTHEW WASHINGTON
NDOC No. 10614647
c/o High Desert State Prison
P.O. Box 650
Indian Springs, NV 89018

BY /s/ Carrie M. Connolly
Employee, Clark County Public
Defender's Office