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Respondent.

Docket 66697 Document 2014-38804

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.
5

6 2. Our office filed the Notice of Appeal in this matter on October 10, 2014. This
7 case is governed by the provisions of NRAP 3C, which require the Appellant to file a Fast Track
8 Statement 40 days after the filing of the Notice of Appeal. Accordingly, the instant Fast Track
9 Statement is due to be filed no later than Tuesday, November 25, 2014.
10

11 3. I filed a Request for Rough Draft Transcripts on October 10, 2014. The
12 reporter received the request on October 10, 2014. NRAP Rule 3C required the reporter to
13 produce the rough draft transcript by October 30, 2014.
14

15 4. The original intent of NRAP 3C was to allow court reporters twenty days to
16 file all requested transcripts, and allow trial counsel twenty days thereafter to file the fast track
17 statement. In many cases counsel does not receive the transcripts for at least 5-7 days after they
18 are filed.

19 5. Currently, I have received one of the seven requested transcripts. The
20 transcripts of 06/30/14, 07/07/14, 07/08/14, 07/09/14, 07/30/14 and 09/10/14 are still
21 outstanding. Accordingly, I am requesting a seventy-five day extension of time within which to
22 prepare and file the instant Fast Track Statement. The seventy-five day number constitutes a
23 guess regarding when the court reporter actually prepares the transcripts and allows sufficient
24 time after that for the review of the record and the writing of the Fast Track Statement.
25

26 6. The request for seventy-five days also takes into account the holidays in
27 December and January because there are fewer business days due to the holidays. It also allows
28 us time to send a copy of the appendix to the Defendant for his review.

1 7. This Motion for Extension is made in good faith and not for the purpose of
2 delay.

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

4 EXECUTED on the 25th day of November, 2014.

5
6 /s/ Sharon G. Dickinson
7 SHARON G. DICKINSON

8
9
10 **CERTIFICATE OF SERVICE**

11 I hereby certify that this document was filed electronically with the Nevada
12 Supreme Court on the 25th day of November, 2014. Electronic Service of the foregoing
13 document shall be made in accordance with the Master Service List as follows:

14
15 CATHERINE CORTEZ MASTO SHARON G. DICKINSON
16 STEVEN S. OWENS HOWARD S. BROOKS

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

19 STEVE DELL MCNEILL
20 NDOC No. 84046
21 c/o High Desert State Prison
22 P.O. Box 650
23 Indian Springs, NV 89018

24 BY /s/ Carrie M. Connolly
25 Employee, Clark County Public
26 Defender's Office
27
28