1	IN THE SUPREME COURT OF THE STATE OF NEVADA
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3	JONATHAN QUISANO,)
4 5	Appellant,) Electronically Filed Dec 16 2014 08:31 a.m.
6	vs. Case Noracie K. Lindeman Clerk of Supreme Court
7 8	THE STATE OF NEVADA,
° 9	Respondent.
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11	APPELLANT'S MOTION FOR EXTENSION OF TIME DUE TO LATE RECEIPT OF TRANSCRIPTS
12	Comes Now Appellant JONATHAN QUISANO, by and through Deputy Public
13 14	Defender NANCY L. LEMCKE, and moves for a sixty (60) day extension of time from
15	Monday, December 15, 2014, through and including Friday, February 13, 2015, within which to
16	file the Fast Track Statement in this case. This Motion is based upon the attached Declaration of
17	counsel.
18	DATED this 15 th day of December, 2014.
19 20	PHILIP J. KOHN
20	CLARK COUNTY PUBLIC DEFENDER
22	
23	By <u>/s/ Nancy L. Lemcke</u> NANCY L. LEMCKE, #5416
24	Deputy Public Defender 309 So. Third Street, Suite #226
25	Las Vegas, Nevada 89155-2610 (702) 455-4685
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27 28	
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1	DECLARATION OF NANCY L. LEMCKE
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 5	history of this case.
5 6	2. Our office filed the Notice of Appeal in this matter on October 30, 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 Monday, December 15, 2014.
10	3. I filed a Request for Rough Draft Transcripts on October 30, 2014. The
11	reporter received the request on October 30, 2014. NRAP Rule 3C required the reporter to
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13 14	produce the rough draft transcript by Wednesday, November 19, 2014.
14	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. The final transcripts in this matter were filed on December 9, 2014. Appellate
20	staff is in the process of printing all transcripts. Once the transcripts are printed the appendix
21	will be compiled, Bates stamped and forwarded to Declarant. Accordingly, I am requesting a
22	sixty day extension of time within which to prepare and file the instant Fast Track Statement.
23 24	The sixty day number should allow sufficient time for declarant to review the record, conduct
25	any research and for the writing of the Fast Track Statement.
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1	6. 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 15 th day of December, 2014.
5	/s/ Nancy L. Lemcke
6 7	NANCY L. LEMCKE
7	
8 9	CERTIFICATE OF SERVICE
10	I hereby certify that this document was filed electronically with the Nevada
11	
12	Supreme Court on the 15 th day of December, 2014. Electronic Service of the foregoing
12	document shall be made in accordance with the Master Service List as follows:
13	CATHERINE CORTEZ MASTONANCY L. LEMCKESTEVEN S. OWENSHOWARD S. BROOKS
15	I further certify that I served a copy of this document by mailing a true and
16	
17	correct copy thereof, postage pre-paid, addressed to:
18	JONATHAN QUISANO NDOC No. 1128389
19	c/o High Desert State Prison
20	P.O. Box 650 Indian Springs, NV 89018
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22	
23	BY <u>/s/ Carrie M. Connolly</u> Employee, Clark County Public
24	Defender's Office
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