

MARC SCHACHTER,
Appellant,
vs.
THE STATE OF NEVADA,
Respondent.

Case No. 67673

COMES NOW, the Alternate Public Defender's Office, by and through counsel, and respectfully request that this Court enter an Order extending the time in which the Appellant may file his Fast Track Statement in the above-entitled matter, to and including June 30, 2015. This request is predicated on NRAP 26(b) and the attached Affidavit of Counsel.

By: /s/ JARROD T. HICKMAN
JARROD T. HICKMAN
Deputy Alternate Public Defender
Attorney for Appellant

AFFIDAVIT OF COUNSEL

STATE OF NEVADA)
)
COUNTY OF WASHOE)

I, JARROD T. HICKMAN, do hereby swear under penalty of perjury that the assertions of this affidavit are true.

1. That your affiant is a duly licensed attorney in the State of Nevada and is counsel of record for Appellant.

2. That your affiant is requesting an extension of time from June 10 2015, the date the Appellant's brief is currently due, to June 30, 2015. This is the second request for an extension of time.

3. The initial request for an extension of time was predicated upon the absence of a transcript necessary for preparation of the fast track statement. Although the request for said transcript was filed April 29, 2015, it was not filed with the district court and provided to the appellant until June 2, 2015.

4. That appellant proceeded in proper person in all pre-trial proceedings and the trial itself. Counsel was appointed to represent appellant prior to sentencing because of habitual criminal allegations.

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5. On June 9, 2015, counsel spoke with Terrance McCarthy, Deputy District Attorney, regarding this extension. He does not oppose this request for an extension of time.

6. That counsel is diligently working on the fast track statement and that this motion is made in good faith and not for purposes of delay.

Further your affiant sayeth not.

By: 
JARROD T. HICKMAN
Deputy Alternate Public Defender

Subscribed and sworn to before me
on this 9th day of June, 2015,
by Jarrod T. Hickman


NOTARY PUBLIC



CERTIFICATE OF SERVICE

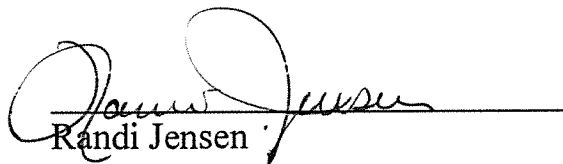
I hereby certify that I am an employee of the Washoe County Alternate Public Defender's Office and that on this date I served a copy of the **MOTION FOR EXTENSION OF TIME** to the following:

MARC SCHACHTER, #91445
SOUTHERN DESERT CORRECTIONAL CENTER
20825 COLD CREEK RD.
INDIAN SPRINGS, NV 89070
Via U.S. Mail

ADAM LAXALT
ATTORNEY GENERAL STATE OF NEVADA
100 N. CARSON STREET
CARSON CITY, NEVADA 89701
Via Electronic Mail

WASHOE COUNTY DISTRICT ATTORNEY
Attn: Appellate Department
Via Electronic Mail

DATED this 9th day of June, 2015.


Randi Jensen