

THE SUPREME COURT OF THE STATE OF NEVADA

QUINZALE MASON,

No. 67830

Electronically Filed
Jun 05 2015 11:44 a.m.
Tracie K. Lindeman
Clerk of Supreme Court

Appellant,

vs.

THE STATE OF NEVADA,

Respondent.

MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S FAST TRACK

STATEMENT AND JOINT APPENDIX

John Reese Petty, counsel for the Appellant, applies for an extension of time of 30 days, to and including, July 8, 2015, within which to file Appellant's Fast Track Statement and Joint Appendix in this appeal. The reasons for this request are set forth in the attached affidavit.

DATED this 5th day of June 2015.

/s/ John Reese Petty

JOHN REESE PETTY, Chief Deputy
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AFFIDAVIT

STATE OF NEVADA)
 : ss.
COUNTY OF WASHOE)

JOHN REESE PETTY, under penalty of perjury, deposes and says:

1. I am a Chief Deputy in the Washoe County Public Defender's Office and I am Appellant's counsel in this direct appeal. The fast track statement and joint appendix in this case are currently due on June 8, 2015. I have previously been granted a 5-day telephonic extension of time.

2. The initial five-day extension of time was requested because I had just completed and filed an opening brief and appendix in *Trelease v. State*, which was then due on June 1, 2015—the same date that the fast track statement in this appeal was due. The instant request is made because I just completed and filed a fast track statement and appendix in *Herzog v. State*, which was due on June 8, 2015—the same date as the fast track statement is due in this appeal.

3. My other duties as a chief deputy have taken time from my appellate work and have prevented me from completing the fast track statement and appendix in this appeal.

4. This appeal is from a jury trial. I believe that I will be able to complete and file a quality fast track statement (and joint appendix) in this appeal within the next

30 days. I am requesting 30 days because I hope to be on a family vacation in San Diego, California during the middle of the month of June.

5. Respondent does not oppose this request for an extension of time.

6. Therefore, I am requesting an extension of time of 30 days to and including July 8, 2015, within which to file Appellant's fast track statement and joint appendix in this appeal.

7. This motion for an extension of time is made in good faith, and not solely for the purpose of delay.


JOHN REESE PETTY

Subscribed and Sworn to before me this 5th day of June, 2015, by John Reese Petty.


NOTARY PUBLIC



CERTIFICATE OF SERVICE

I hereby certify that this document was filed electronically with the Nevada Supreme Court on the 5th day of June 2015. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Terrence P. McCarthy, Chief Appellate Deputy,
Washoe County District Attorney's Office

I further certify that I served a copy of this document by mailing a true and correct copy thereof to:

Mr. Quinzale Mason (#1135809)
Northern Nevada Correctional Center
P.O. Box 7000
Carson City, Nevada 89702

John Reese Petty
Washoe County Public Defender's Office