

"original"

IN THE SUPREME COURT OF THE STATE OF NEVADA

* * * * *

Fredys A. Martinez,)
petitioner.)

Case No. 69277
District Court Case No. C226586

-VS-

State of Nevada

Defendant(s)

FILED

DEC 22 2015

TRACIE K. LINDEMAN
CLERK OF SUPREME COURT
BY [Signature]
DEPUTY CLERK

MOTION TO APPOINT COUNSEL

Comes now, Fredys A. Martinez, Petitioner in pro se, and moves the Court for an order appointing him counsel for the foregoing proceedings.

This motion is based upon all documents in the original record and/or appellate record herein, NRAP 46(c) and the following.

This Court may "appoint counsel to represent indigent criminal defendants and indigent habeas corpus petitioners in original proceedings" before it. NRAP 46(c). See also George v. State, 122 Nev. 1, 127 P.3d 1055 (2006) (Court may remand case to district court for appointment of counsel for appeal).

Appointment would properly promote justice herein, as (1) the issues at bar are complex, (2) the movant is financially unable to obtain counsel at his own expense, and (3) the issues presented in this matter are meritorious and entitle movant to relief (Check if applicable) ___ There are additional or

expanded reasons supporting appointment of counsel attached hereto on additional page(s), which are incorporated as if set

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1 forth herein. These factors demonstrate the propriety of
2 appointment of counsel herein. See e.g. NRS 34.750(1) (examples
3 of criteria warranting appointment of counsel in habeas corpus
4 proceedings).

5 For the reasons set forth herein, the Court should order
6 the appointment of counsel for and in relation to the instant
7 proceedings.

8 Dated this 16 day of December, 2015.


9 
10 Freddy A. Martinez #1003276
11 Lovelock Correctional Center
12 1200 Prison Road
13 Lovelock, Nevada 89419

14 petitioner In Pro Se

15 CERTIFICATE OF SERVICE

16 I do certify that I mailed a true and correct copy of
17 the foregoing to the below address(es) on this 16 day of
18 December, 2015, by placing same in the U.S. Mail via
19 prison law library staff:

20 Steven B. Wolfson, District Attorney
21 Office of the District Attorney
22 200 Lewis Avenue
23 P.O. Box 552212
24 Las Vegas, NV 89155-2212

25
26 
27 Freddy A. Martinez #1003276
28 petitioner In Pro Se