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2 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

3 JOSHUA BACHARACH,

No.: 69677

Electronically Filed  
Mar 10 2016 08:34 a.m.  
Tracie K. Lindeman  
Clerk of Supreme Court

4 Appellant,

5  
6 vs.

7 THE STATE OF NEVADA,

8 Respondent.  
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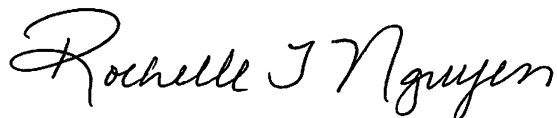
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11 **APPELLANT'S MOTION TO EXPAND TIME TO FILE FAST TRACK**  
12 **STATEMENT AND APPENDIX**

13 COMES NOW, Appellant, JOSHUA BACHARACH, by and through his  
14 attorney, Rochelle T. Nguyen, Esq., of NGUYEN & LAY, and respectfully  
15 requests this Court allow leave to expand time to file fast track statement by sixty  
16 (60) days for the reasons set forth in the points and authorities therein and the  
17 attached declaration of counsel.

18 Dated this 9<sup>th</sup> day of March, 2016.

19 Respectfully Submitted,

20 NGUYEN & LAY

21 

22  
23 **ROCHELLE T. NGUYEN, ESQ.**

24 Nevada State Bar No. 008205

25 732 S. 6<sup>th</sup> St., Ste. 102

26 Las Vegas, NV 89101

27 Phone: (702) 383-3200

28 Fax: (702) 675-8174

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2 **POINTS AND AUTHORITES**

3 NRAP Rule 26(b)(1)(A) provides as follows:

4 For good cause, the court may extend the time prescribed by these Rules or  
5 by its order to perform any act, or may permit an act to be done after that time  
6 expires.

7 **DECLARATION OF ROCHELLE T. NGUYEN, ESQ.**

8 ROCHELLE T. NGUYEN, ESQ., declares under penalty of perjury:

9 1. That I am a licensed attorney practicing law in the State of Nevada,  
10 and that I have been appointed to represent the Appellant, JOSHUA  
11 BACHARACH, in the above-captioned case.

12 2. That the Appellant is making this request in good faith so that he be  
13 allowed additional time to fully investigate, research and raise meritorious issues  
14 to this Honorable Court.

15 3. That the Appellant's Fast Track Statement and Appendix is currently  
16 due on March 9, 2016.

17 4. In order to effectively prepare and research this direct appeal,  
18 undersigned counsel has had to fully investigate the existing record in the justice  
19 and district courts.

20 5. Review of the record on appeal includes a nearly week long jury trial.  
21 That the transcripts requested, including the jury trial transcripts were received on  
22 February 25, 2016. That undersigned has not had enough time to fully review  
23 those transcripts in preparation of this appeal.

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2           6.       That the Declarant respectfully request that the Court allow for an  
3 additional sixty (60) days to file the Appellant's Fast Track Statement and  
4 Appendix.  
5

6 Dated this 9<sup>th</sup> day of March, 2016.  
7

8                               NGUYEN & LAY  
9

10                               *Rochelle T. Nguyen*  
11

12                               \_\_\_\_\_  
13                               ROCHELLE T. NGUYEN, ESQ.  
14                               Nevada State Bar No. 008205  
15                               732 S. 6<sup>th</sup> St., Ste. 102  
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**JOSHUA BACHARACH (90607)**  
**High Desert State Prison**  
**P.O. Box 650**  
**Indian Springs, NV 89070-650**

Rochelle Nguyen

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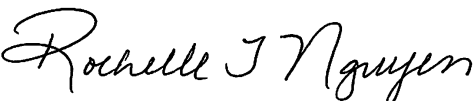
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2                   **CERTIFICATE OF ELECTRONIC TRANSMISSION**

3           The undersigned hereby declares that on the 9<sup>th</sup> day of March, 2016, an  
4 electronic copy of the foregoing Appellant's Motion to Expand time to File Fast  
5 Track Statement and Appendix was sent via the master transmission list with the  
6 Nevada Supreme Court to the following:  
7

8  
9 STEVEN WOLFSON  
10 Clark County District Attorney  
11 200 South Lewis Street  
Las Vegas, Nevada 89101

12 ADAM P. LAXALT  
13 Nevada Attorney General  
14 100 North Carson Street  
Carson City, Nevada 89701-4717

15  
16 NGUYEN & LAY

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18 

19  
20 \_\_\_\_\_  
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