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

3 JOSHUA BACHARACH,

No.: 69677

Electronically Filed
May 10 2016 09:25 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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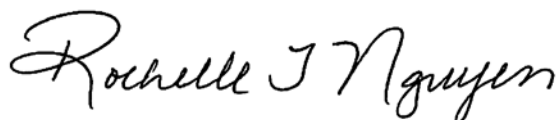
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11 **APPELLANT'S SECOND MOTION TO EXPAND TIME TO FILE FAST**
12 **TRACK STATEMENT AND APPENDIX**

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 thirty
16 (30) days for the reasons set forth in the points and authorities therein and the
17 attached declaration of counsel.

18 Dated this 9th day of May, 2016.

19 Respectfully Submitted,

20 NGUYEN & LAY

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23

ROCHELLE T. NGUYEN, ESQ.

24 Nevada State Bar No. 008205

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POINTS AND AUTHORITES

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

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

DECLARATION OF ROCHELLE T. NGUYEN, ESQ.

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

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

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

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

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

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

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6. Additionally, because the Appellant, Mr. Bacharach is currently incarcerated in the Nevada Department of Corrections. This has made communication extremely limited. Undersigned counsel would like a short continuance to do a final review of the appeal with Mr. Bacharach at High Desert State Prison, prior to filing.

Dated this 9th day of May, 2016.

Rochelle Nguyen

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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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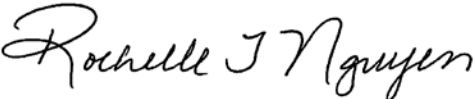
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2 **CERTIFICATE OF ELECTRONIC TRANSMISSION**

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

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

13 ADAM P. LAXALT
14 Nevada Attorney General
15 100 North Carson Street
16 Carson City, Nevada 89701-4717

17
18 NGUYEN & LAY

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