

IN THE SUPREME COURT OF THE STATE OF NEVADA
FILED

JUN 14 2016

XXXXXXXXXX

TRACIE K. LINDEMAN
CLERK OF SUPREME COURT

BY DEPUTY CLERK

FERRILL J. VOLPICELLI,
APPELLANT,

CASE NO. 10126

VS.

D.C. No. CR03-1263

STATE OF NEVADA,
RESPONDENTS,

MOTION FOR APPOINTMENT
OF ATTORNEY AT LAW
RICHARD CORNELL.

APPELLANT, FERRILL J. VOLPICELLI, ('VOLPICELLI'), IN
PRO SE, HEREBY SUBMITS THIS MOTION FOR
APPOINTMENT OF ATTORNEY AT LAW RICHARD
CORNELL, AS COURT-APPOINTED COUNSEL
CONCERNING THE MATTERS PENDING APPEAL IN
THIS COURT.

THIS MOTION IS BROUGHT PURSUANT TO NRS
34.750, ALL PAPERS, PLEADINGS AND DOCUMENTS
ON FILE HEREIN, AND THE FOLLOWING
POINTS AND AUTHORITIES.

RECEIVED

JUN 13 2016

TRACIE K. LINDEMAN
CLERK OF SUPREME COURT
DEPUTY CLERK

16-18483

POINTS AND AUTHORITIES

VOLPICELLI IS UNABLE TO AFFORD COUNSEL AND HIS APPEAL IS EXTRAORDINARILY COMPLEX. THEREFORE, HE IS MOVING THE COURT FOR RICHARD CORNELL AS COURT-APPOINTED COUNSEL BECAUSE OF HIS FAMILIARITY WITH THE ISSUES IN THE INSTANT CASE.

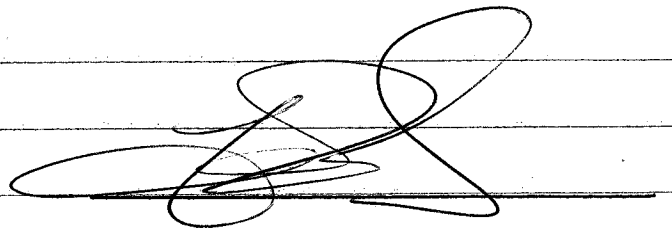
VOLPICELLI ASSERTS THAT IT IS INCUMBENT UPON THE COURT TO ALLOW MR. CORNELL TO FURTHER INVESTIGATE SAID ISSUES WHICH CONTINUE TO DETAIN THE APPELLANT UNCONSTITUTIONALLY.

VOLPICELLI HAS MET THE THRESHOLD ENUMERATED IN NRS 34.700, AND IT WOULD NOT ONLY SATISFY JUSTICE, BUT FUNDAMENTAL FAIRNESS AS WELL.

CONCLUSION

FOR THE REASONS ABOVE, AND IN THE INTEREST OF JURISPRUDENCE, THE COURT SHOULD APPOINT RICHARD CORNELL AS COURT-APPOINTED COUNSEL OF RECORD IN THIS MATTER.

DATED THE 9th DAY
OF JUNE, 2016



FERRILL J. VOLPICELLI
79565 @ LCC
APPELLANT IN PRO SE

CERTIFICATE OF SERVICE BY MAIL

I do certify that I mailed a true and correct copy of the
foregoing Motion for Appointment of Attorney
to the below address(es) on this 9 day of JUNE,
2016, by placing same in the U.S. Mail via prison law library
staff, pursuant to NRCP 5(b):

WASHOE COUNTY District Attorney
75 Court St
Reno, NV 89501

FERRIS VANCE # 79805
Lovelock Correctional Center
1200 Prison Road
Lovelock, Nevada 89419

FERRIS VANCE In Pro Se

AFFIRMATION PURSUANT TO NRS 239B.030

The undersigned does hereby affirm that the preceding
Motion for Appointment of Attorney filed in
NSC District Court Case No. 20216 does not contain the
social security number of any person.

Dated this 9 day of JUNE, 2016.

FERRIS VANCE
FERRIS VANCE In Pro Se