IN THE SUPREME COURT OF THE STATE OF NEVADA

JOHN DEMON MORGAN, Appellant, vs. THE STATE OF NEVADA, Respondent.	)	Case No. 70424

Electronically Filed
Jun 28 2016 03:30 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

APPELLANT'S MOTION FOR EXTENSION OF TIME DUE TO MISSING TRANSCRIPTS

Comes Now Appellant JOHN DEMON MORGAN, by and through Deputy Public Defender SHARON G. DICKINSON, and moves for an extension of time of seventy-five (75) days from Tuesday, June 28, 2016 through and including Monday, September 12, 2016 to file the Fast Track Statement in this case. The grounds for this request are described in the attached Declaration.

DATED this 28th day of June, 2016.

PHILIP J. KOHN
CLARK COUNTY PUBLIC DEFENDER

By *\/s/ Sharon G. Dickinson*
SHARON G. DICKINSON, #3710
Deputy Public Defender
309 So. Third Street, Suite #226
Las Vegas, Nevada 89155-2610
(702) 455-4685

Docket 70424 Document 2016-20262

DECLARATION OF SHARON G. DICKINSON

1. I am an attorney licensed to practice law in the State of Nevada; I am a deputy public defender assigned to handle the appeal of this matter; I am familiar with the procedural history of this case.

2. Our office filed the Notice of Appeal in this matter on May 17, 2016. This case is governed by the provisions of NRAP 3C, which requires the Appellant to file a Fast Track Statement 40 days after the filing of the Notice of Appeal. In this case, the Fast Track Statement is due Tuesday, June 28, 2016.

3. Our office filed a Request for Rough Draft Transcripts in this case on May 17, 2016. The reporter received the request on May 17, 2016. NRAP Rule 3C required the reporter to produce the rough draft transcript by Monday, June 6, 2016.

4. The original intent of NRAP 3C was to allow the court reporters twenty days to file the transcripts, and trial counsel then had twenty days to file the fast track statement. In many cases counsel does not receive the filed transcripts for at least 5-7 days after they are filed.

5. In this particular case I have not received the dates of 02/22/16, 02/23/16, 02/24/16 and 04/14/16.

6. On June 21, 2016, Court Recorder Ramirez filed a motion for extension asking for an extension until July 21, 2016.

///

///

///

///

///

///

7. According, I am asking for an extension of seventy-five (75) days to prepare and file the Fast Track Statement in this case.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on the 28th day of June, 2016.

/s/ Sharon G. Dickinson
SHARON G. DICKINSON

CERTIFICATE OF SERVICE

I hereby certify that this document was filed electronically with the Nevada Supreme Court on the 28th day of June, 2016. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

ADAM LAXALT
STEVEN S. OWENS

SHARON G. DICKINSON
HOWARD S. BROOKS

I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage pre-paid, addressed to:

JOHN DEMON MORGAN
NDOC No. 1158013
c/o High Desert State Prison
P.O. Box 650
Indian Springs, NV 89070

BY */s/ Carrie M. Connolly*
Employee, Clark County Public Defender's Office