

1	DECLARATION OF MAXWELL A. BERKLEY
2	1. I am an attorney licensed to practice law in the State of Nevada; I am a deputy
3	public defender assigned to handle the appeal of this matter; I am familiar with the procedural
4	history of this case.
6	2. As this Honorable Court is aware, Declarant has filed two prior motions for
7	extension which this Honorable Court graciously granted.
:8	3. Declarant is aware that this Honorable Court generally does not consider
9	caseload sufficient cause for an extension of time.
10	4. Declarant began preparation of the Fast Track Statement and was in hopes of
11 12	finalizing said document by today, January 11, 2017. Declarant was out of the office during the
13	holiday season for pre-planned time away and this cut down on preparation time.
14	5. Declarant required the assistance of Appellate staff during this time and due to
15	the fact that Appellate staff recently lost one of her part-time employees, Appellate staff's
16 17	availibility has been somewhat limited. Declarant was able to obtain the information from
17 18	Appellate staff this week, however, this did not allow sufficient time to input the information
19	into the Fast Track and finalize said Fast Track Statement for filing.
20	6. Accordingly, declarant is requesting an additional thirty (30) days to input the
21	information and finalize said Fast Track. At that time declarant will submit the Fast Track
22	Statement to Appellate staff for final review and filing.
23 24	7. This motion is made in good faith, and not for the purpose of delay.
25	I declare under penalty of perjury that the foregoing is true and correct.
26	EXECUTED on the 11 th day of January, 2017.
27	DABCOTED on the IT day of January, 2017,
28	<u>/s/ Maxwell A. Berkley</u> MAXWELL A. BERKLEY
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ł	CERTIFICATE OF SERVICE
2	I hereby certify that this document was filed electronically with the Nevada
3	Supreme Court on the 11 th day of January, 2017. Electronic Service of the foregoing document
4	shall be made in accordance with the Master Service List as follows:
5	ADAM LAXALT MAXWELL A. BERKLEY
.6 7	STEVEN S. OWENS HOWARD S. BROOKS
7 8	I further certify that I served a copy of this document by mailing a true and
.9	correct copy thereof, postage pre-paid, addressed to:
10	Anthony Jackson
11	I.D. No: 6018419 Clark County Detention Center
12	330 Casino Center Blvd. Las Vegas, NV 89101
13	Las vegas, in v as for
14	
15	BY <u>/s/ Carrie M. Connolly</u> Employee, Clark County Public
16	Defender's Office
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