



1                                    **DECLARATION OF DEBORAH L. WESTBROOK**

2                                    1. I am an attorney licensed to practice law in the State of Nevada; I  
3  
4 am a deputy public defender assigned to handle the appeal of this matter; I am  
5 familiar with the procedural history of this case.  
6

7                                    2. On November 16, 2016, Sayedbashe Sayedzada's appeal was  
8 docketed in the Nevada Supreme Court as a regular appeal pursuant to NRAP 31  
9 (a)(1).  
10

11                                  3. On December 9, 2016, this Court entered an Order redesignating  
12 this appeal as a "fast track appeal" which reset the deadline for the Fast Track  
13 Statement as January 30, 2017.  
14

15                                  4. On January 11, 2017, Court Recorder Christine Erickson filed a  
16 Motion for Extension of Time to submit transcripts. This Court granted Ms.  
17 Erickson's request and reset the appellate deadlines follows: transcripts due  
18 February 3, 2017 and Fast Track Statement due February 23, 2017.  
19

20                                  5. The remaining transcripts were filed on February 4, 2017.  
21  
22 However, I have not yet received a copy of the appellant's appendix in this case  
23 because our office is currently understaffed. At the end of December 2016, the  
24 Appellate Team clerk who was responsible for preparing appendices resigned.  
25 Her replacement has not yet been hired. Without a copy of appellant's appendix, I  
26 have not yet begun work on the instant appeal. Therefore, additional time is  
27  
28

1 needed so the Appellate Team staff can prepare and deliver the appendix in this  
2 case.

3  
4 6. In addition, I have not yet had an opportunity to speak with my  
5 client, Sayedbashe Sayedzada. Our office did not handle Mr. Sayedzada's  
6 sentencing because the district court granted his motion to dismiss the Clark  
7 County Public Defender's office after the trial. John George was appointed to  
8 represent Mr. Sayedzada at sentencing. The Public Defender's Office was  
9 reappointed after sentencing. Under the circumstances, there may be issues related  
10 to sentencing that our office is currently unaware of. Additional time is necessary  
11 so I can speak with Mr. Sayedzada before filing a Fast Track Statement on his  
12 behalf.

13  
14 7. In my professional opinion, a sixty (60) day extension of time is  
15 necessary in order to safeguard Mr. Sayedzada's Sixth Amendment right to the  
16 effective assistance of counsel, and his 5th and 14th Amendment rights to due  
17 process. Therefore, I am requesting a 60-day extension of time to file the Fast  
18 Track Statement, up to and including **April 24, 2017**.

19 ///

20 ///

21 ///

22 ///

23 ///

1           8. This Motion for Extension is made in good faith and not for the  
2 purpose of delay;  
3

4           I declare under penalty of perjury that the foregoing is true and  
5 correct.  
6

7           EXECUTED on the 21st day of February, 2017.

8                                 /s/ Deborah L. Westbrook

9                                 DEBORAH L. WESTBROOK

10  
11                                 **CERTIFICATE OF SERVICE**

12           I hereby certify that this document was filed electronically with the  
13 Nevada Supreme Court on the 21st day of February, 2017. Electronic Service of  
14 the foregoing document shall be made in accordance with the Master Service List  
15 as follows:  
16

17  
18         ADAM LAXALT  
19         STEVEN S. OWENS

               DEBORAH L. WESTBROOK  
               HOWARD S. BROOKS

20           I further certify that I served a copy of this document by mailing a  
21 true and correct copy thereof, postage pre-paid, addressed to:  
22

23                         SAYEDBASHE SAYEDZADA  
24                         c/o High Desert State Prison  
25                         P.O. Box 650  
                               Indian Springs, NV 89070

26  
27                                 BY /s/ Carrie M. Connolly  
28                                 Employee, Clark County Public  
   Defender's Office