

IN THE SUPREME COURT OF THE STATE OF NEVADA

KEANDRE VALENTINE,)
)
 Appellant,)
)
 vs.)
)
 THE STATE OF NEVADA,)
)
 Respondent.)
_____)

Electronically Filed
Aug 06 2018 10:51 a.m.
Elizabeth A. Brown
Clerk of Supreme Court
Case No. 74468

APPELLANT’S MOTION TO FILE
AN AMENDED OPENING BRIEF

COMES NOW Appellant, KEANDRE VALENTINE, by and through her attorney, SHARON G. DICKINSON, Deputy Public Defender, and pursuant to NRAP 27 asks this Court to Appellant to file an Amended Opening Brief to correct the table of authorities. The Opening Brief was submitted to this Court on August 2, 2018. This Motion is based upon the declaration and Memorandum and all papers and pleadings on file herein.

DATED this 6 day of August, 2018.

PHILIP J. KOHN
CLARK COUNTY PUBLIC DEFENDER

By /s/ Sharon G. Dickinson
SHARON G. DICKINSON, #3710
Deputy Public Defender

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. Keandre Valentine was convicted of 14 serious felonies and was sentenced to a minimum of 18 years before being eligible for parole.

3. On August 2, 2018, I gave the Opening Brief to our secretary to prepare and file. On August 3, 2018, I saw the brief and noticed that not all legal citations referenced in the brief were listed in the Table of Authorities. I asked our secretary to add those legal authorities that are missing.

4. In view of the above, I am asking the Court to permit the filing of an Amended Opening Brief. I am not changing any arguments. The only changes are to add the missing legal authorities to the Table of Authorities.

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

EXECUTED on the 6 day of August, 2018.

/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 6 day of August, 2018. 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:

KEANDRE VALENTINE
NDOC No. 1187170
c/o Ely State Prison
P.O. Box 1989
Ely, NV 89301

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