IN THE SUPREME COURT OF THE STATE OF NEVADA

ANTHONY JACKSON, Appellant, vs. THE STATE OF NEVADA, Respondent.	))))))))))	Case No. 70870

Electronically Filed
Nov 10 2016 03:57 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

APPELLANT'S MOTION FOR EXTENSION OF TIME

Comes Now Appellant ANTHONY JACKSON, by and through Deputy Public Defender MAXWELL A. BERKLEY, and moves for an extension of time of thirty (30) days from Thursday, November 10, 2016 through and including Monday, December 12, 2016 to file the Fast Track Statement in this case. The grounds for this request are described in the attached Declaration.

DATED this 10th day of November, 2016.

PHILIP J. KOHN
CLARK COUNTY PUBLIC DEFENDER

By *__/s/ Maxwell A. Berkley__*
MAXWELL A. BERKLEY, #12180
Deputy Public Defender
309 So. Third Street, Suite #226
Las Vegas, Nevada 89155-2610
(702) 455-4685

Docket 70870 Document 2016-35225

DECLARATION OF MAXWELL A. BERKLEY

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. Appellant filed his Pro Per Notice of Appeal in this matter on July 20, 2016. This Honorable Court filed an order regarding entry of written judgment and suspending briefing on 08/30/16.

3. On September 21, 2016, this Honorable Court filed its order reinstating briefing making the Fast Track Statement due today, November 10, 2016.

4. On October 4, 2016 the final transcripts in this matter were received and the appendix was finalized. A copy of said appendix was sent to the Appellant for his review and comment.

5. The appellant filed a pro per notice of appeal and as such, Declarant wanted Appellant to review the appendix and advise after his review.

6. Declarant is requesting an additional thirty (30) days to finalize the preparation and filing of the Fast Track Statement.

7. This motion is made in good faith, and not for the purpose of delay.

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

EXECUTED on the 10th day of November, 2016.

/s/ Maxwell A. Berkley
MAXWELL A. BERKLEY

CERTIFICATE OF SERVICE

I hereby certify that this document was filed electronically with the Nevada Supreme Court on the 10th day of November, 2016. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

ADAM LAXALT
STEVEN S. OWENS

MAXWELL A. BERKLEY
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:

Anthony Jackson
I.D. No: 6018419
Clark County Detention Center
330 Casino Center Blvd.
Las Vegas, NV 89101

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