

IN THE SUPREME COURT OF THE STATE OF NEVADA

CHARLES ANTHONY SKAGGS,  
Appellant,

vs.

THE STATE OF NEVADA,  
Respondent.

No. 78845

Electronically Filed  
Jun 03 2019 10:18 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

CHARLES ANTHONY SKAGGS,  
Appellant,

vs.

THE STATE OF NEVADA,  
Respondent.

No. 78847

MOTION TO CONSOLIDATE DOCKET NOS. 78845 AND 78847 FOR  
FULL BRIEFING AND MOTION TO REMOVE DOCKET NO. 78845  
FROM FAST TRACK BRIEFING

Appellant Charles Anthony Skaggs has two appeals currently pending before this Court. One of them—No. 78845—is designated a fast track appeal and the other one—No. 78847—is a full briefing appeal; although a scheduling order has not yet been entered in 78847. Both of these appeals stem from the same arraignment hearing and the same sentencing hearing. The consolidated sentencing hearing was held on April 17, 2019, and judgments of conviction were filed the next day in

both cases. Accordingly, Mr. Skaggs moves this Court for an order removing docket No. 78845 from the fast track program and consolidating both appeals for full briefing.

This motion is based on Rule 3C(k)(2)(A) and (B)(i), and on reasons of judicial economy. The specific reasons supporting this motion are set out in the following declaration of counsel.

DATED this 3rd day of June 2019.

/s/ John Reese Petty

JOHN REESE PETTY, Chief Deputy  
Nevada State Bar Number 10  
350 South Center Street, 5th Floor  
Reno, Nevada 89520-0027  
(775) 337-4827  
jpetty@washoecounty.us

#### DECLARATION OF COUNSEL

I, JOHN REESE PETTY, pursuant to NRS 53.045, declare under penalty of perjury that the following is true and correct:

1. I am a Chief Deputy in the Washoe County Public Defender's Office and I am Appellant's counsel in these appeals. Docket No. 78845 is designated a fast track appeal and docket no. 78847 is a full briefing appeal. Currently the Court has not set a due date for filing of the

opening brief in docket no. 78847, but the fast track statement in docket no. 78845 is due on July 9, 2019.

2. NRAP 3C(k)(2)(A) allows a party to seek leave of the Supreme Court to remove an appeal from the fast track program and to direct full briefing. Additionally, under this rule a party's motion for full briefing shall be granted "unless it is filed solely for the purpose of delay." This motion for full briefing is made in good faith and not solely for the purpose of delay. It is made in order to efficiently brief both appeals together under the same appellate format and within the same appellate time frame.

3. On May 16, 2019 Mr. Skaggs filed his own notices of appeal in these cases. On May 31, 2019, I filed my notice of appearance as appellate counsel in these cases.

4. These appeals all stem from two separate cases that were consolidated in the district court; Mr. Skaggs's arraignment in both cases took place on the same day and sentences were imposed in both cases during a sentencing hearing held on April 17, 2019. Thus, any potential appellate issues will be predicated on the same district court proceedings.

5. I am requesting therefore that both appeals be consolidated for full briefing. And I am specifically requesting that docket no. 78845 be removed from the fast track program in order to accomplish the first request.



JOHN REESE PETTY

### CERTIFICATE OF SERVICE

I hereby certify that this document was filed electronically with the Nevada Supreme Court on the 3rd day of June 2019. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Jennifer P. Noble, Chief Appellate Deputy  
Washoe County District Attorney's Office

I further certify that I served a copy of this document by mailing a true and correct copy thereof to:

Charles Anthony Skaggs (#1117743)  
Northern Nevada Correctional Center  
P.O. Box 7000  
Carson City, Nevada 89702

John Reese Petty  
Washoe County Public Defender's Office