

RONNEKA ANN GUIDRY,  
Appellant,  
vs.  
THE STATE OF NEVADA,  
Respondent.

Docket 80156 Document 2020-40968

## **DECLARATION OF SHARON G. DICKINSON**

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

2. This is the second request for an extension. The first request was by way of stipulation between the parties. I am asking for an extension of 66 days to allow time to read, research, and write the appeal based on the reasons outlined below.

3. At some point mid-August 2020, I was assigned to handle Ms. Guidry's appeal. On 09/03/20, I filed a notice of appearance. Shortly thereafter, I established contact with Ms. Guidry and we have conversed about her case several times. Thus, I have been assigned this case for 3 months or less.

4. In the perfect world and in the ordinary full-briefing system, Counsel receives the case when the notice of appeal is filed. After the court reporter/recorder has filed the requested transcripts, Counsel is given 90 days plus an additional 30, through a stipulation, to read the record, research the issues, and prepare and file the Opening Brief. See NRAP 9(b)(1)(A), NRAP 31(a)(1)(A), NRAP 31(b)(2). Here, I was given much less time.

5. This case is out of the ordinary because the original appellate attorney, who was also the trial attorney, withdrew from the case after filing the notice of appeal and requesting some transcripts. When he left the case in June of 2020, another attorney in our office assigned himself the case, requested more transcripts, and then left the office the beginning of August. Thereafter, I filed for a 30 day stipulation which was granted, making the Opening Brief due today.

6. Even with the additional 30 days, I was left with insufficient time to complete the remaining tasks required to prosecute the appeal. I have been in contact with Ms. Guidry about requesting a continuance and she understands the reasons. She said she has no objection to an extension.

7. Another reason why I have not had sufficient time to work on Ms. Guidry's case is because during the past few months, I have had other work to complete. During September, I finalized the work I was doing on the Statewide Criminal Rules Commission, continued working on obtaining jury selection documents for the evidentiary hearing in *State v. Valentine*, 135 Nev. 463 (2019), c-16-316081-1 (remand from the Nevada Supreme Court for an evidentiary hearing), and I filed the Opening Brief in *Ogunbanwo v. State*, Case No. 79723. During September and October, I have been working on the appeal of *Martin v. State*, Case No. 80077, and

attended 4 district court hearings (and another one is scheduled for tomorrow) regarding a motion to reconstruct the record I filed for the Martin case, I contacted Mr. Martin repeatedly through the prison system, and set up a court appearance for Mr. Martin through BlueJeans through the prison because the district court wanted to talk to him. During October and November I have continued working with the jury commissioner's attorney to obtain the documents we need for the *Valentine* evidentiary hearing. Today, our scheduled 11/17/20 *Valentine* hearing was continued to 01/12/21 because we received an additional batch of documents on 11/03/20 that we are still sorting through.

8. The appendix in this case currently consists of 1743 pages without any exhibits being included. I have received approximately 250 pages of exhibits and 7 DVD/CSs. As of today, I still need to review all exhibits, DVD/CDs, and I have reviewed less than half of the appendix. This is a homicide case and there are approximately 50 pages of minutes. This is a 5 day trial, with 17 witnesses.

9. Although I have not had time to read the trial or all the documents included in the appendix, I have reviewed several motions to suppress filed pre-trial. In part, the three motions to suppress arise out of an incident wherein a METRO detective gave one of Ms. Guidry's children

money in exchange for the child telling him her mother's password for her cell phone – a cell phone that the police had in police custody. Another attorney in our office and I are in the process of researching this issue and need additional time to complete the project.

10. Another reason I am asking for an extension of 66 days is because I may need to go back to court to obtain the JAVs because in numerous instances the record shows a video was played without any reference to what part of the video was shown to the jury. Because we are going into the holiday season, it will be more difficult to get into court if needed. Additionally: (1) the Valentine hearing has now been continued to 01/12/21 and I will need to complete extensive work on that case in the next month, (2) I am still working to finalize the Martin Opening Brief, (3) I need to complete the evidentiary hearing in Harvey v. State, Case No. 75911, which the Court recently remanded to district court, and (4) I need to file a Reply in Ousley v. State, Case No. 79140.

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11. this request for an extension is not made for the purposes of delay.

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

EXECUTED on the 9 day of November, 2020.

/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 9 day of November, 2020. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

AARON D. FORD  
ALEXANDER CHEN

SHARON G. DICKINSON

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

RONNEKA ANN GUIDRY  
NDOC NO. 1138388  
c/o Florence McClure Women's Correctional Center  
4370 Smiley Road  
Las Vegas, NV 89115

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