

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

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KEANDRE VALENTINE,	)	No. 84777	Electronically Filed
	)		Jun 16 2022 12:51 p.m.
Petitioner,	)	(Dist Ct. No. C-16-316081-1)	Elizabeth A. Brown
	)		Clerk of Supreme Court
	)		
v.	)		
	)		
THE EIGHTH JUDICIAL DISTRICT	)		
COURT OF THE STATE OF NEVADA,	)		
COUNTY OF CLARK, THE	)		
HONORABLE JACQUELINE	)		
BLUTH, DISTRICT COURT JUDGE,	)		
	)		
Respondent,	)		
	)		
THE STATE OF NEVADA,	)		
	)		
Real Party in Interest.)	)		

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**ADDENDUM TO PETITION FOR WRIT OF  
PROHIBITION/MANDAMUS**

**(Relief Prior to District Hearing Date of June 1, 2022,  
to be changed to: (Requesting Relief by to July 1, 2022 ).**

COMES NOW the Petitioner, KEANDRE VALENTINE, by and through his counsel Chief Deputy Public Defender, SHARON G. DICKINSON, and files this Addendum to the Petition for Writ of Prohibition/Mandamus filed May 27, 2022. In this Addendum, Petitioner

changes his request for relief date to July 1, 2022, based on the reasons outlined in the Declaration of Counsel.

DATED this 16<sup>th</sup> day of June, 2022.

DARIN F. IMLAY  
CLARK COUNTY PUBLIC DEFENDER

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

## **DECLARATION**

SHARON G. DICKINSON makes the following declaration:

1. I am an attorney duly licensed to practice law in the State of Nevada; I am a Chief Deputy Public Defender for the Clark County Public Defender's Office and I was appointed to represent Petitioner Keandre Valentine in the direct appeal of his case. On direct appeal, this Court remanded Mr. Valentine's case to the district court for an evidentiary hearing and I am assisting the trial attorneys with the hearing.

2. I am more than 18 years of age and am competent to testify as to the matters stated herein. I am familiar with the procedural history of the case and the substantive allegations made by The State of Nevada. I also have personal knowledge of the facts stated herein or I have been informed of these facts and believe them to be true.

3. Today, June 16, 2022, Mr. Valentine's case was on calendar in District Court VI for a status check regarding the Petition he filed with the Nevada Supreme Court. At the hearing, the State offered to negotiate Mr. Valentine's case if he agreed to waive the completion of the evidentiary hearing. At approximately 11:30 AM, the prosecutors confirmed their offer to negotiate with Mr. Valentine in writing.

4. After confirming the offer to negotiate from the State, I spoke to Mr. Chen, Chief Deputy District Attorney of the Appellate Division of the Clark County District Attorney's Office. I advised him that I would file an addendum to this Petition so that the parties would have an opportunity to negotiate. He understood. Mr. Chen and I have agreed to prepare paperwork for the contemplated negotiations.

4. Mr. Valentine is scheduled to return to District Court VI on Thursday, June 23, 2022, for possible negotiations. If the negotiations go through as anticipated, then Mr. Valentine will be filing a withdrawal of this Petition. If the negotiations do not go through, then he will continue his pursuit of this Petition. Thus, I am seeking to change the date for relief to July 1, 2022, in case the negotiations do not proceed to fruition.

I declare under penalty of perjury that the foregoing is true and correct. (NRS 53.045).

EXECUTED this 21 day of September, 2020.

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

**CERTIFICATE OF SERVICE**

I hereby certify that this document was filed electronically with the Nevada Supreme Court on the 16<sup>th</sup> day of June, 2022. 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:

Honorable Jacqueline Bluth  
District Court, Department VI  
200 Lewis Avenue  
Las Vegas, NV 89101

BY \_\_\_\_\_ *Carrie Connelly* \_\_\_\_\_  
Employee, Clark County Public  
Defender's Office