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Tracie K. Lindeman  
Clerk of Supreme Court

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

6 RONALD ERNEST LAKEMAN, ) **Supreme Court No. 64609**  
7 ) District Court Case: C265107  
8 Appellant, )  
9 vs. )  
10 THE STATE OF NEVADA, )  
11 Respondent. )

12 **MOTION TO EXTEND TIME TO FILE FAST TRACK STATEMENT**

13  
14 Comes now, Frederick A. Santacroce, Esq., counsel for Appellant, Ronald Lakeman, and  
15 moves this Court for an Order granting an extension of ninety (90) days for the filing of the Fast  
16 Track Statement.

17 This Motion is made and based upon NRAP 3C(2), the affidavit of Frederick A. Santacroce,  
18 Esq., filed herewith, and the points and Authorities herein.

19 Dated this 17th day of January, 2014.

20 /s/ Frederick A. Santacroce

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1 **POINTS AND AUTHORITIES**

2 NRAP 3C(2) states:

3 **(2) Fast Track Statement and Response; Supplemental Statement and**  
4 **Response.**

5 **(A) Five-Day Telephonic Extension.** Counsel may request by  
6 telephone a 5-day extension of time for filing fast track statements and responses,  
7 and supplemental fast track statements and responses. If good cause is shown, the  
8 clerk of the Supreme Court may grant the request by telephone or by written order  
9 of the clerk.

10 **(B) Additional Extensions by Motion.** Subsequent extensions of time  
11 for filing fast track statements and responses, and supplemental fast track  
12 statements and responses shall be granted only upon motion to the Supreme  
13 Court. The motion shall justify the requested extension in light of the time limits  
14 provided in this Rule, and shall specify the exact length of the extension  
15 requested. Extensions of time for the filing of fast track statements and responses,  
16 and supplemental fast track statements and responses shall be granted only upon  
17 demonstration of extreme need or merit. Sanctions may be imposed if a motion is  
18 brought without reasonable grounds.

19 This is the first request for an extension of time to file the Fast Track Statement. On  
20 December 17, 2013, the rough draft transcript was order. Mr. Santacroce has been informed by the  
21 court reporter that given the length of the trial the rough draft transcript will not be available until  
22 late February. It is essential that Mr. Santacroce have the rough draft transcript when preparing the  
23 Fast Track Statement. Therefore, counsel for the Appellant respectfully requests that he be granted  
24 an additional ninety (90) days to file the Fast Track Statement.

25 Dated this 17th day of January, 2014.

26 /s/ Frederick A. Santacroce

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that this document was filed electronically with the Nevada Supreme Court  
3 on January 17, 2014. Electronic Service of the foregoing document shall be made in accordance with  
4 the Master Service List as follows:

5 Richard A. Wright, Wright, Stanish & Winckler

6 Stephen Wolfson, District Attorney Clark County

7 Catherine Cortez-Masto, Attorney General State of Nevada

8  
9 Dated this 17th day of January, 2014

10 /s/ Melissa Davis

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On Behalf of Santacroe Law Offices, Ltd.