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Respondent.

APPELLANT'S MOTION FOR EXTENSION OF TIME

Comes Now Appellant MATTHEW WASHINGTON, by and through Deputy Public Defender SHARON G. DICKINSON, and moves for a sixty (60) day extension of time from Thursday, December 18, 2014, through and including Tuesday, February 17, 2015, within which to file the Opening Brief in this case. This Motion is based upon the attached Declaration of counsel.

DATED this 18th day of December, 2014.

PHILIP J. KOHN
CLARK COUNTY PUBLIC DEFENDER

By Sharon Dickinson
SHARON G. DICKINSON, #3710
Deputy Public Defender
309 So. Third Street, Suite #226
Las Vegas, Nevada 89155-2610
(702) 455-4685

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1 trial there were almost 300 exhibits introduced during the trial and penalty phase. I did not learn
2 that we received a copy of the entire file from private counsel until approximately 40 days ago.

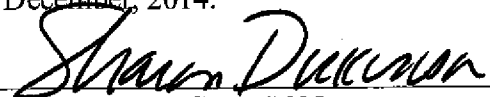
3 7. This was a 9 day trial and the appendix currently contains 2055 pages, without
4 any exhibits added. Prior to trial, the prosecutor told the court she planned on calling 40
5 witnesses. However, a quick review of the appendix indicates approximately 23 witnesses
6 testified. This case involved two trials and one penalty hearing for one murder count. The
7 second trial was a case of possession of a firearm by an ex-felon.
8

9 8. In asking for a 60 day extension, I am taking into account all the cases I need
10 to complete and the fact I have had no contact with Mr. Washington. Although I have written
11 him, he has yet to contact me. I have had contact with a family member. Because of my injury,
12 I continued several other cases that need to be completed before I begin working on his.
13

14 9. This Motion for Extension is made in good faith and not for the purpose of
15 delay.
16

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

18 EXECUTED on the 18th day of December, 2014.

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20 SHARON G. DICKINSON
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