

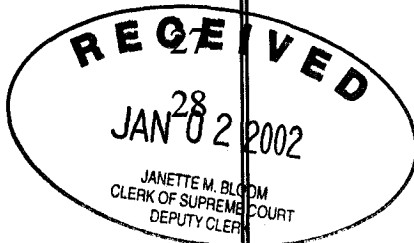
ORIGINAL

FILED

JAN - 2 2002
JANETTE M. BLOOM
CLERK OF SUPREME COURT
BY [Signature]
DEPUTY CLERK

EMERGENCY MOTION FOR STAY OF
DISTRICT COURT PROCEEDINGS

By: CHRISTOPHER LAURENT
Chief Deputy District Attorney
Attorney for Petitioner



102-00037

DECLARATION
(NRS 53.045)

I, CHRISTOPHER LAURENT, am a duly licensed attorney in the State of Nevada and am employed with the Clark County District Attorney's Office.

Said moved the district court to order the defendant to provide discovery of the note, tests, results and reports of psychiatric examinations conducted by the defendant's experts. Said experts were listed on his notice of expert. The State has also moved, based on the defendant's announcement that he will be presenting psychiatric testimony, that the order allow the state to conduct its own examination of the defendant by means of an independent psychiatric expert. The district court has denied the State's motions and denied the State's request for stay of district court proceedings.

Defendant is currently out on bond with the condition of house arrest and is being charged with he open murder of his ex-wife.

This motion for emergency stay is necessary as the case is scheduled to start on January 2, 2001 and there is no adequate remedy at law. If this stay is not granted the State will be force to proceed to trial without the statutorily required discovery.

The attached motion is made in good faith and not for the purpose of delay.
I declare under penalty of perjury the foregoing is true and correct.

Executed this 27th day of December 2001.

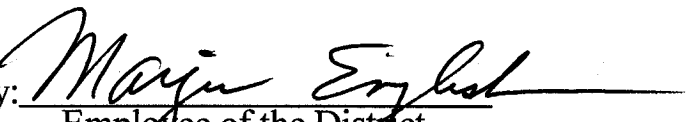

CHRISTOPHER LAURENT

1 **CERTIFICATE OF FACSIMILE TRANSMISSION**

2 I hereby certify that service of EMERGENCY MOTION FOR STAY OF
3 DISTRICT COURT PROCEEDINGS, was made December 27, 2001, by facsimile
4 transmission to:

5 Gloria Navaro
6 Special Deputy Public Defender
7 FAX # 455-6273

8 Chief Judge Mark E. Gibbons
9 District Court Department VII
10 FAX # 455-2430

11 By: 
12 Employee of the District
13 Attorney's Office

14
15 **CERTIFICATE OF SERVICE**

16 I hereby certify and affirm that service of the above and foregoing Emergency
17 Motion For Stay of District Court Proceedings, was made this 28th day of December,
18 2001, by depositing a copy in the U.S. Mail, postage pre-paid, addressed to the
19 attorney of record:

20 Gloria Navaro
21 Clark County Special Public Defender
22 309 South Third Street, 4th Floor
23 Post Office Box 552316
24 Las Vegas, Nevada 89155-2316

25 Chief Judge Mark E. Gibbons
26 District Court Department VII
27 200 South Third Street
28 Las Vegas, NV 89155


Secretary, Clark County District Attorney's Office