

IN THE SUPREME COURT OF THE STATE OF NEVADA

* * * * *

Case No. 86976

Electronically Filed
Dec 14 2023 01:15 PM
Elizabeth A. Brown
Clerk of Supreme Court

PIERRE A. HASCHEFF,

Appellant/Cross-Respondent,

vs.

LYNDA HASCHEFF,

Respondent/Cross-Appellant.

Appeal From Special Order Entered After Final Judgment
Second Judicial District Court Case No. DV13-00656

**STIPULATION FOR EXTENSION OF TIME
FOR APPELLANT/CROSS-RESPONDENT TO FILE REPLIES TO
RESPONSES TO MOTIONS TO TAKE JUDICIAL NOTICE AND TO
SEAL PORTIONS OF APPELLANT'S APPENDIX**

LEONARD LAW, PC
Debbie Leonard (#8260)
955 S. Virginia St., Suite #220
Reno, NV 89502
775-964-4656
debbie@leonardlawpc.com

Attorney for Respondent/Cross-Appellant

Pursuant to NRAP 26(b)(2), Appellant/Cross-Respondent Pierre A. Hascheff and Respondent/Cross-Appellant Lynda Hascheff, through their respective counsel, stipulate and agree as follows:

On November 16, 2023, Pierre filed his Opening Brief, Appendix Volumes 1-8, a Motion to Take Judicial Notice, and a Motion to Seal Portions of Appellant's Appendix ("Motions").

On November 21, 2023, Lynda's counsel made a telephonic request pursuant to 26(b)(1)(B) for a 14-day extension of time to respond to Pierre's Motions, which was granted that same date. Lynda filed her responses to the Motions on December 11, 2023.

On December 11, 2023, the parties filed a stipulation for extension of time for Lynda to file her answering brief on appeal and opening brief on cross-appeal. The stipulation was treated as a motion for extension of time and was granted on December 13, 2023. Lynda's Answering Brief on Appeal and Opening Brief on Cross-Appeal is now due on January 17, 2024.

In the December 11, 2023 stipulation, the parties also stipulated to an extension of time for Pierre to file his replies to the Motions, which was denied because the stipulation did not contain an original signature pursuant to NRAP 25(a)(5) and NEFCR 11(c)(1), (2). The parties now re-file the stipulation related to the extension of time for Pierre's replies.

Pursuant to NRAP 26(b)(2), the parties stipulate that the due date for Pierre's Replies in support of the Motions shall be extended by 21 days, to and including January 8, 2024.


This extension of time is necessary due to Pierre's counsel facing a number of conflicting deadlines and obligations, including an ongoing trial. Additionally, Pierre's counsel has personal commitments during the intervening holidays. The parties respectfully submit that good cause exists for the requested extension.

AFFIRMATION

Pursuant to NRS 239B.030, the undersigned do hereby affirm that the preceding document does not contain the social security number of any person.

Dated: December 14, 2023

FENNEMORE CRAIG, P.C.


Therese M. Shanks (NSB 12890)
7800 Rancharrah Parkway
Reno, NV 89511
tshanks@fennemorelaw.com

Attorney for Appellant/Cross-Respondent

Dated: December 14, 2023

LEONARD LAW, PC

/s/ Debbie Leonard
Debbie Leonard (NSB 8260)
955 S. Virginia St., Suite 220
Reno, NV 89502
debbie@leonardlawpc.com

Attorney for Respondent/Cross-Appellant

