

1 IN THE SUPREME COURT OF THE STATE OF NEVADA

2 SEBASTIAN MARTINEZ,

3 Appellant,

4 vs.

No. 55073 Electronically Filed
Sep 27 2010 11:06 a.m.
Tracie K. Lindeman

5 KRISTI RAE FREDIANELLI; ANTHONY
6 FREDIANELLI; and MIKAELLA RAE
7 FLANNERY, AKA MIKAELLA RAE
8 FREDIANELLI, A MINOR, BY NEVADA
9 WELFARE, AS GUARDIAN AD LITEM,

10 Respondents.

11 **MOTION FOR EXTENSION OF TIME**
12 **FOR RESPONSE TO PROPER PERSON STATEMENT**

13 Respondents hereby move for a three-week extension of time for filing a response to
14 appellant's civil proper person statement. The response is currently due for filing on
15 September 27, 2010. Therefore, respondents seek an extension until October 18, 2010. This
16 is respondents' first request for an extension.

17 The court's Order Directing Response identified various issues to be addressed in the
18 response. Because this is a proper person civil appeal, respondents' attorneys were not provided
19 with a complete copy of the record on appeal prepared and transmitted to this court by the
20 district court clerk's office. Instead, we only received the index to the record on appeal. Thus,
21 the undersigned appellate counsel for respondents has needed to compile his own working copy
22 of the record. Additionally, there were multiple transcripts of district court hearings, but
23 respondents' attorneys were not provided with copies. Thus, counsel needed to review the
24 transcripts at the clerk's office.

25 Respondents' counsel has been reviewing portions of the record, researching legal issues,
26 and preparing the response. Unfortunately, counsel has been unable to complete the response
27 within the designated time. Accordingly, respondents hereby request an additional three weeks,
28 until October 18, 2010, in which to file the response to the proper person statement. No further

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1 extensions are anticipated. This motion is made in good faith, without the intent to delay the
2 appeal unnecessarily.

3 DATED: 9/27/10

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CERTIFICATE OF MAILING

Pursuant to NRAP 25, I certify that I am an employee of Lemons, Grundy & Eisenberg and that on this date I caused to be deposited for mailing at Reno, Nevada, a true copy of the foregoing addressed to:

Sebastian Martinez
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3551 E. Bonanza Road
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DATED this 27 day of Sept., 2010.
