

1 IN THE SUPREME COURT OF THE STATE OF NEVADA

2 * * * * *

3 KIRK ROSS HARRISON,

4 Appellant,

5 vs.

6 VIVIAN MARIE LEE HARRISON,

7 Respondent.

Electronically Filed
Mar 24 2015 02:41 p.m.
NO. 66157 Tracie K. Lindeman
Clerk of Supreme Court

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9 **MOTION TO EXPAND FAST TRACK STATEMENT**

10 Pursuant to NRAP 3E(d)(3), appellant Kirk Harrison hereby moves to expand the length
11 of his fast track statement, which is presently due for filing on April 6, 2015.¹ Pursuant to
12 NRAP 3E(e)(2), a fast track statement is acceptable if it contains no more than 7,000 words.
13 Appellant is requesting permission to file a fast track statement consisting of 10,000 words.

14 This appeal involves child custody issues primarily involving a “teenage discretion”
15 provision. The appeal also involves the propriety of a parenting coordinating provision. As set
16 forth in appellant’s motion to remove the case from the fast track program, there are numerous
17 issues appellant intends to raise in the fast track statement. These issues include standards for
18 interpreting teenage discretion provisions; the extent to which such provisions can empower the
19 child to require her parents to modify custody schedules; appropriate interpretation of teenage
20 discretion provisions; whether parenting coordinator provisions are unenforceable, indefinite,
21 and contrary to public policy; the extent to which a district court can grant judicial authority to
22 a parenting coordinator; and whether parenting coordinator provisions can be in the best
23 interests of children.


24 These important issues involve matters of first impression and statewide precedent. An
25 adequate discussion of these issues could easily exceed twice the normal word limit for a fast
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28 ¹In a separate motion, appellant is requesting a 5-day extension of time for the fast track
statement.

1 track statement. Nevertheless, appellant and counsel Eisenberg believe they can present the
2 issues adequately in a fast track statement consisting of no more than 10,000 words.²

3 Accordingly, appellant hereby requests an order expanding the fast track statement to
4 10,000 words.

5 DATED: March 24, 2015

6 
7 ROBERT L. EISENBERG (Bar #0950)
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10 ATTORNEYS FOR APPELLANT
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27 ² In the order denying appellant's motion to remove the case from the fast track program,
28 the court stated: "Appellant/cross-respondent may file a motion to file an expanded fast track
statement in accordance with NRAP 3E(d)(3), if deemed warranted."

1 CERTIFICATE OF SERVICE

2 I certify that I am an employee of Lemons, Grundy & Eisenberg and that on this date the
3 foregoing was filed electronically with the Clerk of the Nevada Supreme Court, and therefore
4 electronic service was made in accordance with the master service list as follows:

5 Edward L. Kainen
6 Thomas J. Standish
7 Radford J. Smith
8 Gary R. Silverman
9 Mary Anne Decaria


10 I further certify that on this date I served a copy of this notice, postage prepaid, by U.S.

11 Mail to:

12 Kirk Harrison
13 1535 Sherri Lane
14 Boulder City, Nevada 89005

15 Settlement Judge Lansford Levitt
16 4747 Caughlin Parkway
17 Suite 6
18 Reno, Nevada 89519

19 DATED: 3/24/15

20 
21 Vicki Shapiro, Assistant to
22 ROBERT L. EISENBERG
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