

**In the Supreme Court of Nevada**

IN THE MATTER OF: THE W.N.  
CONNELL AND MARJORIE T.  
CONNELL LIVING TRUST, DATED  
MAY 18, 1972,

JACQUELINE M. MONTOYA; AND  
KATHRYN A. BOUVIER,

Appellants,

vs.

ELEANOR C. AHERN A/K/A  
ELEANOR CONNELL HARTMAN  
AHERN,

Respondent.

Supreme Court Case No. 69737

Electronically Filed

Feb 11 2016 01:03 p.m. .

District Court Case No. K. Lindeman

P-09-066425-T Clerk of Supreme Court

Appeal from the Eighth Judicial

District Court, The Honorable

Gloria Sturman Presiding

**MOTION FOR PERMISSION TO FILE  
MOTION IN EXCESS OF PAGE LIMITATION**

Appellants, JACQUELINE M. MONTOYA and KATHRYN A. BOUVIER, by and through their counsel of record, Joseph Powell and Daniel P. Kiefer, hereby request permission to file their Emergency Motion Under NRAP27(e) which exceeds the 10-page limit prescribed by NRAP 27(d)(2) by 12 pages. The Emergency Motion Under NRAP27(e) conforms to the Nevada Rules of Appellate Procedure in all other respects. The proposed Emergency Motion is attached hereto as **Exhibit 1**.

**Certification of Counsel**

*Undersigned counsel certifies as follows:*

NRAP 27(d)(2) governs the page limits for motions filed with this Court and provides that a motion may not exceed 10 pages unless the court permits or directs otherwise. In this case, after considerable review and revision, the Emergency Motion for Stay exceeds the limit by 12 pages (although this includes the caption page and the NRAP 27(e) certificate). The Appellants respectfully submit that good cause

exists to grant leave to file the Emergency Motion Under NRAP27(e) in excess of the 10-page limit given the extensive and complex factual background and procedural history of this matter.

Counsel for the Appellants has made a diligent attempt to limit the length of the Emergency Motion Under NRAP27(e), however, this matter has been litigated since 2009. In order to adequately provide this Honorable Court with the factual background and procedural history required to ensure a proper ruling, it was necessary to exceed the page limit.

Because the Appellants desire to provide this Honorable Court with all relevant information needed to issue a proper ruling on their Emergency Motion, the Appellants respectfully request permission to exceed the page limit set by NRAP 27(d)(2) by 12 pages.

DATED this 11<sup>th</sup> day of February, 2016.

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