

1 IN THE SUPREME COURT OF THE STATE OF NEVADA

2 SEBASTIAN MARTINEZ, )  
3 )  
4 Plaintiff, )  
5 )  
6 v. )  
7 KRISTI RAE FREDIANELLI, )  
8 Defendant. )  
9 )

Case No. 69992

Electronically Filed  
Apr 11 2016 01:09 p.m.  
Tracie K. Lindeman  
Clerk of Supreme Court

**EX PARTE MOTION TO EXTEND TIME TO FILE DOCKETING STATEMENT**

10 COMES NOW, Appellant, Kristi Fredianelli, by and through her counsel, Patricia A. Marr,  
11 Esq. of Patricia A. Marr, Ltd. and hereby files her *Ex Parte Motion to Extend Time to File*  
12 *Docketing Statement* as follows. Appellant's Motion is made and based upon the following  
13 Memorandum of Points and Authorities, the Declaration of Cindy Wilgren, employee of Patricia A.  
14 Marr, Ltd. and any pleadings and papers on file herein that the Court may consider.  
15

16 Dated this 11<sup>th</sup> day of April, 2016.

17 PATRICIA A. MARR, LTD.

18 /s/Patricia A. Marr, Esq.

19   
20 Patricia A. Marr, Esq.  
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*Attorney for Appellant*

1 MEMORANDUM OF POINTS AND AUTHORITIES

2 I.

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4 **FACTS**

5 On March 14, 2016, Appellant filed her Notice of Appeal.

6 On April 1, 2016, Appellant filed her Case Appeal Statement.

7 On April 11, 2016, Appellant attempted to file her Docketing Statement, however, it the  
8 filing was rejected as untimely.

9  
10 In that regard, the undersigned's staff calendared the due date for the docketing statement  
11 as 20 *judicial* days, having confused the due date with the 10 day judicial day rule, instead of  
12 20 *calendar* days. Thus, staff had the due date for the docketing statement as April 14, 2016,  
13 instead of April 6, 2016, and the undersigned believed that the filing of the docketing statement  
14 was actually early. In any event, the Docketing Statement has been finished and has been  
15 submitted again, forthwith.

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17 II.

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19 **ARGUMENT**

20 **1. NRAP 14 PROVIDES THAT AN EXTENSION OF TIME TO FILE A**  
21 **DOCKETING STATEMENT WILL BE GRANTED FOR GOOD CAUSE.**

22 In this case, the undersigned's staff genuinely believed that she had correctly calendared  
23 the due date. Moreover, the undersigned typically has more oversight over the calendaring in the  
24 office, particularly with the appellate process, however, she has been recovering from substantial  
25 dental work. Accordingly, counsel submits that good cause exists for the filing of the Docketing  
26 Statement.  
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**III.**

**CONCLUSION**

Based upon the foregoing, counsel respectfully requests that the Ex Parte Motion be granted and Appellant's Docketing Statement accepted for filing.

Dated this 11<sup>th</sup> day of April, 2016.

PATRICIA A. MARR, LTD.

/s/Patricia A. Marr, Esq.

Patricia A. Marr, Esq.

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