

1   **IN THE SUPREME COURT OF THE STATE OF NEVADA**

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4 LYUDMYLA ABID,  
5                                   Appellant,

6  
7 v.

8  
9 SEAN ABID,  
10                                 Respondent.

**Electronically Filed**  
**Jun 10 2016 10:14 a.m.**  
Supreme Court No. 09995  
District Court Case No. D-10-424830-2  
**Tracie K. Lindeman**  
**Clerk of Supreme Court**

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13   **MOTION FOR EXTENSION OF TIME TO FILE FAST TRACK STATEMENT**  
14   **AND APPENDIX**

15                   Appellant hereby moves for a three-week extension of time for filing the Fast Track  
16 Statement and Appendix, thereby making it due on July 5, 2016. This is the second  
17 requested extension for the Fast Track Statement and Appendix. The first requested  
18 extension was a one-week telephonic extension. This case was highly contentious and  
19 involved numerous motions and multiple judgments from those motions that caused the  
20 district court to enter the Order that is being appealed.  
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24                   There are a total of thirteen (13) issues on appeal which are set forth in detail in the  
25 Appellant's Docketing Statement filed on April 22, 2016 and present certain issues of first  
26 impression, public policy and an issue arising under the United States and/or Nevada  
27 Constitutions. While the attorneys for the Appellant are diligently working on the Fast  
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1 Track Brief, due to the complexity of this case, it is extremely difficult to meet the present  
2 deadline of June 13, 2016.  
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4 Therefore, the Appellant requests a three-week extension until July 5, 2016 for  
5 filing the Fast Track Statement and Appendix. This motion is being submitted in good  
6 faith, and without the intent to cause undue delay in the appeal.  
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8 Dated this 10<sup>th</sup> day of June, 2016.  
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10 RADFORD J. SMITH, CHARTERED


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12 RADFORD J. SMITH, ESQ.   
13 Nevada State Bar No. 002791  
14 GARIMA VARSHNEY, ESQ.  
15 Nevada State Bar No. 011878  
16 2470 St. Rose Parkway, Suite 206  
17 Henderson, Nevada 89074  
18 *Attorney for Appellant*  
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2 **CERTIFICATE OF SERVICE**

3 I certify that on the 10<sup>th</sup> day of June, 2016, I served a copy of this Motion for  
4 Extension of Time to File Fast Track Statement and Appendix upon all counsel of record  
5  
6 by mailing it by first class mail with sufficient postage prepaid to the following address:

7  
8 John Jones, Esq.  
9 10777 W. Twain Ave., #300  
10 Las Vegas, Nevada 89135  
11 Attorney for Respondent

12  
13 DATED this 10<sup>th</sup> day of June, 2016.

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17 GARIMA VARSHNEY, ESQ.  
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