

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

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3           VIVIAN HARRISON,

4                                   Appellant,

5  
6           v

7           KIRK HARRISON,

8                                   Respondent.  
9

Electronically Filed  
Sep 06 2016 09:03 a.m.  
Supreme Court No. 70727  
District Court Case No. D11-443611-D  
Tracie K. Lindeman  
Clerk of Supreme Court

10                                   **MOTION FOR EXTENSION OF TIME TO FILE FAST TRACK STATEMENT**  
11                                   **AND APPENDIX**

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13           Appellant hereby moves for a 30-day extension of time for filing the Fast Track  
14           Statement and Appendix, thereby making it due on October 3, 2016 This is the first  
15           requested extension for the Fast Track Statement and Appendix. The Appellant did not  
16           request an extension by telephone. This case is highly contentious and involves numerous  
17           motions and multiple judgments from those motions that caused the district court to enter  
18           the Order that is being appealed. This request is also made as a result of Respondent's  
19           Motion filed in the District Court, Plaintiff's Motion for Reconsideration, or, in the  
20           Alternative, Motion for Huneycut Certification, Motion to Amend Findings or Make  
21           Additional Findings, and, Motion to Alter, Amend, and Clarify Order Respondent's  
22           motion is scheduled for hearing on September 28, 2016 at 10:00 a.m.  
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27           There is a total of six (6) issues on appeal which are set forth in detail in the  
28           Appellant's Docketing Statement filed on August 11, 2016 and present certain issues of

1 first impression, public policy and an issue arising under the United States and/or Nevada  
2 Constitutions. While the attorneys for the Appellant are diligently working on the Fast  
3 Track Brief, due to the complexity of this case, it is extremely difficult to meet the present  
4 deadline of September 2, 2016.  
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7 Therefore, the Appellant requests a 30-day extension until October 3, 2016 for  
8 filing the Fast Track Statement and Appendix. This motion is being submitted in good  
9 faith, and without the intent to cause undue delay in the appeal.  
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11 Dated this 2nd day of September, 2016

12 RADFORD J. SMITH, CHARTERED

13   
14 RADFORD J. SMITH, ESQ

15 Nevada State Bar No. 002791

16 KIMBERLY A., MEDINA, ESQ

17 Nevada State Bar No. 014085

18 2470 St. Rose Parkway, Suite 206

19 Henderson, Nevada 89074

20 *Attorney for Appellant*  
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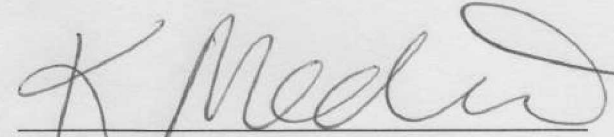
**CERTIFICATE OF SERVICE**

I certify that on the 2<sup>nd</sup> day of September, 2016, I served a copy of this Motion for Extension of Time to File Fast Track Statement and Appendix upon all counsel of record by mailing it by first class mail with sufficient postage prepaid to the following address.

Edward Kainen, Esq  
3303 Novat Street, Suite 200  
Las Vegas, Nevada 89129

Thomas J Standish, Esq  
1635 Village Center Circle, Suite 180  
Las Vegas, Nevada 89134

DATED this 2<sup>nd</sup> day of September, 2016

  
KIMBERLY A. MEDINA, ESQ