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Appellant,

THE STATE OF NEVADA,

Respondent.

**APPELLANT LIPSITZ'S EX-PARTE EMERGENCY MOTION TO FILE
UNDER SEAL: APPELLANT LIPSITZ'S MOTION FOR EXTENSION OF
TIME WITH EXPLANATION OF ATTORNEY FELICIANO'S
EXTENUATING AND MITIGATING CIRCUMSTANCES FOR THIS
HONORABLE COURT'S CONSIDERATION**

COMES NOW Appellant LIPSITZ, by and through AMY A. FELICIANO, ESQ., and moves this Honorable Court to allow Feliciano to file under seal: a Motion for Explanation of Feliciano's sensitive Extenuating and Mitigating Personal and incredibly life-changing hardship and Conditions. Feliciano's personal conditions are of such a sensitive nature that she humbly asks this Court to allow her to file her very personal information under seal, which includes Feliciano's remedial efforts to rectify her situation and her proactivity and plan for her future legal practice.

Feliciano's current condition prevents her from complying with this Court's October 9, 2017, order to produce documents by today. As such, Feliciano asks to

1 include in her explanation motion a motion for an extension of time to comply
2 with this Court's order regarding the above case.
3

4 Feliciano will file the Explanation Motion no later than Friday, October 27,
5 2017. Feliciano asks this Honorable Court for the opportunity to provide this Court
6 with the relevant information to consider in the context of this case and this
7 Court's prior orders.
8

9 Feliciano will comply with this Court's order of October 13, 2017, and file
10 the documents ordered no later than Sunday, October 29, 2017.
11

12 This Motion is based upon the information on file, the information provided
13 above, and the declaration attached herewith.
14

15 DATED this 24th day of October, 2017.
16

17
18 By /s/ Amy A. Feliciano, Esq.
19 AMY A. FELICIANO, ESQ.
20 BAR NUMBER 9596
21 FELICIANO LAW OFFICE, LLC
22 2421 TECH CENTER CT., #100
23 LAS VEGAS, NEVADA 89128
24 (702) 848-4869
25 amy@felicianolawoffice.com
26
27
28

1 **DECLARATION OF /s/ Amy A. Feliciano, Esq.**

2 1. I am an attorney licensed to practice law in the State of Nevada; I
3
4 am the attorney appointed to handle the appeal of this matter; I am familiar with
5 the procedural history of this case.

6 2. That this Court's October 09, 2017, ordered conditional sanctions
7
8 and potential bar referral if not complied with.

9 3. That Feliciano has significant hardship, mitigating, and
10
11 extenuating circumstances that she wishes to let this Court know prior to Its final
12 ruling.

13 3. That Feliciano's condition currently renders her unable to
14
15 comply with this Court's October 09, 2017, Order.

16 4. That Feliciano's condition is of a very sensitive nature and she
17
18 therefore humbly asks this Court to file the Explanation and Motion for Extension
19 under seal, no later than October 27, 2017. The Explanation Motion will be filed
20 no later than October 27, 2017.

21 5. That Feliciano will comply with this Court's October 09, 2017,
22
23 Order requiring production of the substantive documents no later than Sunday,
24
25 October 29, 2017.

26 5. That this request for extension of time is made in good faith
27
28 and not for the purposes of delay.

1 I declare under penalty of perjury that the foregoing is true and
2 correct.
3

4 EXECUTED on the 24th day of October 2017.
5

6 /s/ Amy A. Feliciano, Esq.
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CERTIFICATE OF NO ELECTRONIC SERVICE

This is an **EX-PARTE EMERGENCY APPELLANT PASHMAN’S MOTION
TO FILE MOTION FOR EXTENSION OF TIME WITH EXPLANATION
OF EXTENUATING AND MITIGATING CIRCUMSTANCES**

Thus, Feliciano has not served this Motion as to maintain her privacy.

By /s/ Amy A. Feliciano, Esq.
AMY A. FELICIANO, ESQ.
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