

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

2
3
4 KIRK ROSS HARRISON,

5
6 Appellant,

7 v.

8 VIVIAN MARIE LEE HARRISON,

9 Respondent.
10

Electronically Filed
Nov 21 2017 01:25 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Supreme Court No. 72880
District Court Case No. D-11-443611-D

11 **MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO FAST TRACK**
12 **STATEMENT AND APPENDIX, MOTION FOR EXPANDED FAST TRACK**
13 **RESPONSE**

14 Respondent hereby moves for a brief, two (2) week extension of time for filing the
15 Response to the Fast Track Statement and Appendix, thereby making it due on December
16 6, 2017. This is the first requested extension for the Response to the Fast Track Statement
17 and Appendix. The Appellant did not request an extension by telephone.
18
19

20 While the attorneys for the Respondent are diligently working on the Response to the
21 Fast Track Statement, due to the complexity of this case, it is extremely difficult to meet the
22 present deadline of November 22, 2017. Therefore, Respondent requests a brief, two (2)
23 week extension.
24
25
26
27
28

1 fast track response is acceptable if it contains no more than two-thirds the type-volume
2 specified for a fast track statement.
3

4 On October 12, 2017, Appellant moved to expand his Fast Track Statement to 10,000
5 words. On November 2, 2017, Appellant's request was granted.
6

7 This case is highly contentious. Appellant's Fast Track Statement raises a number of
8 issues that require significant briefing, an analysis of the Evidentiary Hearing and the facts
9 that are set forth in various motions, and an analysis of Dr. John Paglini's report.
10

11 Thus, the complexity of the case and the issues presented warrant granting
12 Respondent's request for additional space. The file of the underlying case is massive, and
13 the history of the provision at issue, which includes a previous appeal, is extensive and
14 complex.
15

16 For those reasons, additional space is necessary to be able to fully respond to
17 Appellant's Fast Track Statement. Thus, Respondent is requesting that she be allowed to
18 submit her Fast Track Response with the same type-volume expansion as granted to
19 Appellant on November 2, 2017, of 10,000 words.
20
21

22 . . .

23 . . .

24 . . .
25
26
27

28 Respondent's request for a brief extension is timely and made in good faith. Thus, if granted,
Respondent's Response would be due December 6, 2017, and her request for an expansion is timely.

1 In conclusion, the Respondent requests a 14-day (two week) extension until
2 December 6, 2017 for filing her Fast Track Response and Appendix. She further requests
3 an expansion of the type-volume limitation of her Response to 10,000 words.
4

5 This motion is being submitted in good faith, and without the intent to cause undue
6 delay in the appeal.
7

8 Dated this 21st day of November 2017.

9 RADFORD J. SMITH, CHARTERED

10 

11 RADFORD J. SMITH, ESQ.

12 Nevada State Bar No. 002791

13 KIMBERLY A. MEDINA, ESQ.

14 Nevada State Bar No. 014085

15 2470 St. Rose Parkway, Suite 206

16 Henderson, Nevada 89074

17 *Attorney for Appellant*
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I certify that on the 21st day of November, 2017 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:

ROBERT L. EISENBERG, ESQ.
Lemons, Grundy, & Eisenberg
6005 Plumas Street, Third Floor
Reno, Nevada 89519

KIRK HARRISON, ESQ.
112 Stone Canyon Road
Boulder City, Nevada 89005

DATED this 21st day of November 2017.


KIMBERLY A. MEDINA, ESQ.