

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

\* \* \* \* \*

AHED SAID SENJAB,

Appellant,

vs.

MOHAMAD ALHULAIBI,

Respondent.

S.C. No.:

D.C. Case No.:

Electronically Filed  
81515  
Nov 17 2020 09:47 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**APPELLANT'S MOTION FOR LEAVE TO FILE REPLY TO  
RESPONDENT'S FAST TRACK RESPONSE**

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## **I. INTRODUCTION**

Ahed Said Senjab requests this Court permit her leave to file a Reply to Mohamad Alhulaibi's Fast Track Response.

## **I. PROCEDURAL FACTS SUPPORTING REQUEST**

Ahed timely filed her Fast Track Statement and its corresponding Appendix on September 21.

Amicus Counsel moved to file a Brief of Amicus Curiae in Support of Reversal on September 25. The Court granted their Motion and filed the Amicus Brief on October 1.

On October 15, Mohamad filed his *Motion to Reconsider, Vacate or Modify that Action Pursuant to NRAP 27(b) This Honorable Court's October 1, 2020 Order or in the Alternative to Grant Respondent an Extended Time for Briefing and Additional Word Volume.*

Pursuant to a telephonic request for extension, Mohamad filed his *Response to Fast Track Statement* on October 19.

Ahed filed her Partial Opposition to Mohamad's Motion on October 20.

On October 27, Ahed filed her *Reply to Fast Track Response*. The next day, the Court struck the *Reply to Fast Track Response*, the Clerk's note stating "The NRAP does not provide for the filing of a reply to a fast track response in child custody cases."

On that same day, the Court denied Mohamad's Request to strike the Amicus Brief and instead granted his request to file an expanded brief in response to the brief of Amicus Curiae within fourteen days of their Order. Mohamad's new due date was set as November 12, 2020. Mohamad filed his extended *Fast Track Response* on November 12.

This Motion Follows.

## **II. RESPONSE TO MOTION**

The Appellate Section of the State Bar has long been uncertain as to whether Replies to Responses to Fast Track Statements require a motion or are a matter of right; the Appellate Practice Manual (at §§ 18:60-62) lists a Reply as “potential,” stating that while there is no express authority for a Reply, there are type-volume size limits for such a Reply, implying that such Replies are contemplated, and suggesting that the “best practice” may be to file a motion for leave. This is such a motion.

In this case, Respondent has filed an expanded response, addressing both the Fast Track Statement, and the brief filed by Amicus. This Court has not seen any comments from Appellant as to the merits of the Amicus filing. This case does implicate substantial issues of first impression, including interstate, uniform act, and federal law issues.

We believe that this Court's consideration of both the Amicus filing and of the arguments set out in Respondent's expanded Response would be assisted by a Reply; we therefore seek leave to file one.

### **III. CONCLUSION**

Based on the foregoing, Ahed requests this Court grant her leave to file her Reply to Response to Fast Track Statement, submitted simultaneously with this Motion.

Dated this 16th day of November, 2020.

Respectfully submitted,  
WILLICK LAW GROUP

//s//Marshal S. Willick, Esq.

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Marshal S. Willick, Esq.  
Attorneys for Appellant

## CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of WILICK LAW GROUP and that on this 17th day of November, 2020, a document entitled *Appellant's Motion for Leave to File Reply to Fast Track Response* was filed electronically with the Clerk of the Nevada Supreme Court, and therefore electronic service was made in accordance with the master service list as follows, to the attorneys listed below at the address, email address, and/or facsimile number indicated below:

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/s/ Justin K. Johnson

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An Employee of WILICK LAW GROUP

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