

Alex B. Ghibaudo, Esq. Nevada Bar Number: 10592 Michancy M. Cramer, Esq. Nevada Bar Number: 11545 **ALEX B. GHIBAUDO, PC** 197 E. California Ave, Suite 250 Las Vegas, Nevada 89104 T: (702) 462-5888 F: (702) 924-6553 E: alex@glawvegas.com *Attorney for Appellant*

Electronically Filed Jun 21 2021 04:04 p.m. Elizabeth A. Brown Clerk of Supreme Court

IN THE SUPREME COURT OF THE STATE OF NEVADA

ASHLEE JACKSON,

Appellant,

vs.

JESUS ZUNIGA,

Respondent.

Sup. Ct. No.: 82444

Dist. Ct. No.: CV0020975

MOTION TO EXTEND TIME TO FILE A TRANSCRIPT REQUEST FORM

COMES NOW Appellant, Alex Ghibaudo, through his attorney, Michancy Cramer, Esq. of the law firm of Alex B. Ghibaudo, PC and files the following motion:

MEMORANDUM OF POINTS AND AUTHORITIES

Under NRAP 26(b)(1)(A) this Court may extend the time prescribed by its Rules or by its order to perform any act, or may permit an act to be done after that



time expires, upon a showing of good cause. Here, on June 8, 2021 a request for transcripts was made. The response indicated that the transcripts would be \$1,100.00 for a 30 day turnaround and \$1,310.00 for a four day turnaround. (See attached).

A request was made for a check to cover that from the firm but, due to continued business disruption from the pandemic (last quarter of this year and last year was far more than a 25% decrease from 2019, seriously disrupting operations), Alex B. Ghibaudo, P.C. requires additional time to tender said payment and file a transcript request form.

As such, Appellant requests that he be given until Friday, June 25, 2021 to tender payment for the transcripts and file his transcript request form.

motion:DATED this 21st day of June, 2021.

<u>/s/ Michancy Cramer</u> Michancy Cramer, Nevada Bar No. 11545 **ALEX B. GHIBAUDO, PC** Attorney for Appellant



CERTIFICATE OF MAILING

Pursuant to NRAP 25(c)(1) and NEFCR 9, I certify that on the 21st day of

June, 2021, that I caused to be served the foregoing MOTION through the Nevada

Supreme Court's electronic filing system to the following:

R. CHRISTOPHER READE, ESQ. Attorney for Respondent/Cross-Appellant

Dated this 21st Day of June, 2021.

/s/ Michancy Cramer, Esq.

Alex B. Ghibaudo, PC



ATTACHMENT

	COPY
1	EIGHTH JUDICIAL DISTRICT COURT FILED
3	FAMILY DIVISION JUN 0 8 2021
4	CLARK COUNTY, NEVADA
5	
6	TARA KELLOGG GHIBAUDO,) CASE NO. D-15-522043-D Plaintiff,)
7) DEPT. H vs.)
8	ALEX GHIBAUDO,) Defendant.) SEALED
9	ESTIMATE OF TRANSCRIPT(S)
10	The office of Transcript Video Services received a request for transcript estimate from Alex Ghibaudo on June 8, 2021, for the following proceedings in the
	above-captioned case:
12	September 17, 2020
14	(September 24, 2020 - Previously Transcribed)
15 16 17	<pre>for original transcripts and one copy. The estimated cost of the transcript is \$1,310.00 for a four-day turnaround time or \$1,110.00 for a thirty-day turnaround time. Payment in the amount of \$1,310.00 or \$1,110.00 must be paid directly to Verbatim Reporting & Transcription to prior to work commencing on the transcript. Please call Verbatim Reporting & Transcription to make a deposit payment with credit card (281) 724-8600 or (520) 303- 7356.</pre>
18	Dated this 8 day of June, 2021.
19	Maria Balagtas, Law Office Assistant II
20	Transcription Video Services
21	Transcript ESTIMATE amount of \$ Direct Pay Invoice \$
22	Received this day of, 2021.
23	This is only an estimate . Upon completion of transcript(s), a balance may be due, or you may receive a refund of your deposit if overpayment is greater than \$15.00.
25	NOTE: STATUTORY FEES ARE SUBJECT TO CHANGE PER LEGISLATIVE SESSION. Items left beyond 90 days are subject to disposal without refund. COUNTY RETENTION POLICY APPROVED BY INTERNAL AUDIT