



Michancy Cramer, Esq.
Bar No. 11545
ALEX B. GHIBAUDO, PC.
197 E. California St., Suite 250
Las Vegas, Nevada 89104
T: (702) 978-7090
F: (702) 924-6553
Email: michancy@glawvegas.com
Attorney for Appellant

Electronically Filed
Aug 26 2021 11:46 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

IN THE SUPREME COURT OF NEVADA

ALEX GHIBAUDO,

Appellant,

vs.

TARA KELLOGG,

Respondent.

Case No.: 82248

**APPELLANT'S FIRST
MOTION TO EXTEND TIME
TO FILE AN OPENING
BRIEF AND APPENDIX**

COMES NOW, Alex Ghibaudo (“Appellant”), through his attorney of record, Michancy Cramer, Esq., of Alex B. Ghibaudo, P.C. and files this motion as follows:

Memorandum of Points and Authorities

I. SUMMARY OF FACTS

The opening brief and appendix in this matter is due today, August 26, 2021. However, the transcripts requested by Appellant were requested on July 13, 2021,



but were not received until August 24, 2021. In addition, Respondent's attorney recently withdrew representation and this Court directed Respondent to hire a new lawyer within 30 days. As such, a continuance is required and requested.

II. LEGAL ANALYSIS

Pursuant to NRAP 26(b)(1)(B) this Court may extend the time after a 14 day extension upon a showing of extraordinary circumstances. Here, Appellants transcripts, which are necessary to this appeal, were delivered on August 24, 2021, a mere two (2) days prior to the due date for the opening brief. Additionally, this Court ordered Respondent to find counsel to assist her in this complicated case but has not done so yet. As such, extraordinary circumstances exist to extend time to file the opening brief and appendix.

III. CONCLUSION

For the foregoing reasons, undersigned requests until no later than September 10, 2021 (or whatever time this Court deems appropriate) to file the opening brief and appendix in this matter

DATED this 26th day of August, 2021.

/s/ Michancy Cramer

MICHANCY CRAMER, Nevada Bar No. 11545
ALEX B. GHIBAUDO, PC
Attorney for Appellant



Certificate of Service

Pursuant to NRAP 25, on August 26, 2021 APPELLANT’S MOTION TO EXTEND TIME was served upon each of the parties to appeal 82248 via electronic service through the Supreme Court of Nevada’s electronic filing system and through the regular mail to:

Tara Kellogg
2050 West Warm Springs Road, #2112
Henderson, Nevada 89014

/s/ Michancy Cramer

An Employee of Alex B. Ghibaudo, PC



EXHIBIT 1



EXHIBIT 2



EXHIBIT 3