

# IN THE SUPREME COURT OF THE STATE OF NEVADA

TODD MATTHEW PHILLIPS,	) Supreme Court No: 82414	Electronically Filed May 25 2021 05:27 p.m. Elizabeth A. Brown Clerk of Supreme Court
Appellant,	) District Court Case No. 18-578142-D	
v.	) <b>RESPONDENT'S MOTION FOR</b>	
	) <b>AN EXTENSION OF TIME TO</b>	
	) <b>FILE RESPONSE TO FAST</b>	
AMBER PHILLIPS, N/K/A	) <b>TRACK STATEMENT</b>	
AMBER KORPAK,	) <b>(FIRST REQUEST)</b>	
	)	
Respondent.	)	
_____	)	

Respondent Amber Phillips, n/k/a Amber Korpak, respectfully moves this Court for an extension of forty (40) days from the current due date within which to file her Fast Track Child Custody Response. The Response is presently due on or before June 2, 2021. The requested extension would make the Response due on or before July 12, 2021. This is Respondent's first request for an extension of time.

The undersigned counsel represents Respondent in a *pro bono* capacity in conjunction with the Legal Aid Center of Southern Nevada. Appellant's fast track statement filed on May 12, 2021. Contains thirty-four (34) issues, seven (7) of which Appellant argues are issues of first impression. Appellant attached to the Court's fast track form, facts, argument, and procedural history totally eleven (11) pages in single-spaced, 11 point Calibri font. Respondent received the record on appeal on Tuesday, May 25, 2021. Due to the numerosity of issues and the lengthy procedural

history of this case, driven by the voluminous papers filed by the Appellant, the undersigned counsel will need additional time to respond to this statement.

Appellant will not be prejudiced by an extension. Appellant requested three extensions in this appeal, one to file his docketing statement and two extensions to file his fast track statement. Contrary to the assertions of Appellant's fast track statement, his parental rights were not terminated. Throughout the district court proceedings, Appellant was afforded opportunities to visit and reunify with the minor child, which Appellant declined.

The requested extension of forty (40) days will allot counsel the time necessary to prepare the response without prejudice to Appellant. This request is presented in good faith and not for purposes of delay or any other improper reason.

Respectfully submitted this 25<sup>th</sup> day of May, 2021.

HUTCHISON & STEFFEN, PLLC

*/s/ Shannon R. Wilson*

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## **CERTIFICATE OF SERVICE**

I certify that I am an employee of HUTCHISON & STEFFEN, PLLC and that on this date the **RESPONDENT’S MOTION FOR AN EXTENSION OF TIME TO FILE RESPONSE TO FAST TRACK STATEMENT (FIRST REQUEST)** was filed electronically with the Clerk of the Nevada Supreme Court, and a copy was mailed via U.S. mail to the attorneys/parties below:

T. Matthew Phillips  
4894 W. Lone Mountain Rd.  
Las Vegas, NV 89130

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*Appellant in Proper Person*

DATED this 25<sup>th</sup> day of May, 2021.

*/s/ Kaylee Conradi*

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An employee of Hutchison & Steffen, PLLC