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Electronically Filed
Nov 17 2021 03:09 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

IN THE SUPREME COURT OF THE STATE OF NEVADA

JEFFREY REED,

Appellant,

v.

ALECIA DRAPER (IND./CONSERV.),

Respondent.

} Supreme Court Case No: 82575
} District Court Case No.: 05D338668

} **APPELLANT'S MOTION TO
EXTEND TIME TO FILE
OPENING BRIEF**

COMES NOW the Appellant, Jeffrey Reed, by and through his attorney of record, Amanda M. Roberts, Esq., and hereby files Appellant's Motion to Extend Time to File Appellant's Opening Brief and Appendix. This Motion is based upon the Points and Authorities attached hereto and all the papers and pleadings on file in this matter.

ROBERTS STOFFEL FAMILY LAW GROUP

By: /s/ Amanda M. Roberts, Esq.

Amanda M. Roberts, Esq.
State Bar of Nevada No. 9294
4411 S. Pecos Road
Las Vegas, Nevada 89121
PH: (702) 474-7007
FAX: (702) 474-7477
EMAIL: efile@lvfamilylaw.com
Attorneys for Appellant, Jeffrey Reed

1 **POINTS AND AUTHORITIES**

2 **I. STATEMENT OF FACTS**

3
4 This case is a post-divorce matter involving child support for an adult who
5 alleges a handicap which pre-dates the adult reaching the age of majority. The
6 Appeal is related The Finding of Fact, Conclusions of Law, and Order filed on
7 January 28, 2021, and the Notice of Entry of same filed on January 28, 2021. The
8 relief granted by the District Court was a finding that Emily Reed was handicapped
9 prior to her reaching the age of majority, which results in an Order of support from
10 both her Mother and Father; child support arrears are owed by Appellant of
11 \$21,500.00; and \$500.00 per month in child support from each parent commencing
12 February 1, 2021.
13

14
15 Since the filing of the Appeal there was a Supreme Court Settlement
16 Conference and two (2) Motions at the District Court level. Although an
17 agreement was not reached at the Supreme Court Settlement Conference, it was
18 believed upon ending same that a settlement might be possible. As such,
19 additional settlement attempts occurred to settle this matter; and the Motions as the
20 District Court level required time to prepare and litigation. Moreover, the
21 Appellant is struggling financially due to health-related issues and the COVID-19
22 pandemic. Thus, he was delayed in paying the fees for transcripts until October 1,
23 2021.
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1 On October 1, 2021, Appellant paid the fees for the transcripts. Pursuant to
2 *NRAP* § 9 (c)(1)(A), Verbatim Reporting was supposed to complete and deliver the
3 transcript by November 1, 2021. Unfortunately, Verbatim Reporting has indicated
4 that due to “experiencing massive amounts of transcript requests based on the
5 Court’s backlog” the transcripts are not complete.¹ On November 16, 2021,
6 Verbatim Reporting indicated it is estimated the transcripts will be ready sometime
7 between November 22, 2021 and November 24, 2021. Furthermore, Verbatim
8 indicated that the company is “making every effort to prepare your transcripts as
9 fast as we possibly can. The current backlog of civil, criminal and juvenile trials,
10 the enormous number of expedited appeals, and the reporter shortage throughout
11 the courts is hitting all of us hard[.]”²

12 II. ARGUMENT

13 *NRAP* § 26(b)(1)(A) states, “[f]or good cause, the court may extend the time
14 (A) prescribed by these Rules or by its order to perform any act or may permit an
15 act to be done after that time expires.” In this matter, there is good cause to allow
16 the Appellant additional time to obtain the transcript and file his Opening Brief in
17 this matter. In this matter, extraordinary circumstances exist which necessitates the
18 time be extended for filing of Appellant’s Opening Brief. It appears from Verbatim
19 Reporting that COVID-19 is having an impact on the companies ability to prepare
20

21 ¹ A copy of the email from Verbatim Reporting is attached hereto as **Exhibit “1”** and is hereby
22 fully incorporated herein by reference.

23 ² A copy of the email from Verbatim Reporting is attached hereto as **Exhibit “2”** and is hereby
24 fully incorporated herein by reference.
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1 transcripts necessary to complete Appellant's Opening Brief, and there are no
2 options to use other services to provide the transcripts.

3 4 **III. CONCLUSION**

5 Based upon the foregoing, Appellant respectfully requests the Court grant
6 him an additional forty-five (45) days during which he will pay the transcript costs
7 and file his Opening Brief.
8

9 Respectfully submitted this 17th day of November, 2021.

10 **ROBERTS STOFFEL FAMILY LAW GROUP**

11 By: /s/ Amanda M. Roberts, Esq.

12 Amanda M. Roberts, Esq.
13 State Bar of Nevada No. 9294
14 4411 S. Pecos Road
15 Las Vegas, Nevada 89121
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19 Attorneys for Appellant, Jeffrey Reed
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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Roberts Stoffel Family Law Group,
and on the 17th day of November, 2021, I served the foregoing Appellant’s Motion
To Extend Time To File Opening Brief, by electronic service as follows:

Elizabeth Brennan Esq.
Email: elizabeth@brennanlawfirm.com
Attorney for Plaintiff, Alecia Draper,
In her Capacity as Conservator for Emily Reed

By: /s/ Amanda M. Roberts, Esq.
Employee of Roberts Stoffel Family Law Group

EXHIBIT “1”

EXHIBIT “1”

EXHIBIT “1”

Sent from Yahoo Mail for iPhone

Begin forwarded message:

On Monday, November 1, 2021, 10:48 AM, Austin Shaw <austin@verbatimrt.com> wrote:

Good afternoon, Mr. Reed -

We are doing our best to prepare your transcripts in a timely manner, however, we're experiencing massive amounts of transcript requests based on the Court's backlog.

Can you please let us know at your earliest convenience what your drop dead date is on receipt of your transcripts? We are trying to prioritize our workload the best we can.

We appreciate your understanding and thank you for your patience.

Austin Shaw
She/Her/Hers Pronouns
Verbatim Reporting & Transcription LLC
austin@verbatimrt.com
(281) 724-8600 | (520) 303-7356

<http://www.verbatimrt.com>



IMPORTANT: The contents of this email and any attachments are confidential. They are intended for the named recipient(s) only. If you have received this email by mistake, please notify the sender immediately and do not disclose the contents to anyone or make copies thereof.

EXHIBIT “2”

EXHIBIT “2”

EXHIBIT “2”

Colleen O'Brien

From: Karla M. Soto <karla@verbatimrt.com>
Sent: Tuesday, November 16, 2021 2:02 PM
To: efile
Cc: 'Kimberly McCright'; 'Michael Pace'
Subject: Reed - Status update

Good afternoon,

The transcripts are in the works. We are trying our best to have them done sooner, but we estimate that they will be ready by November 22-24.

Please understand that we are making every effort to prepare your transcripts as fast as we possibly can. The current backlog of civil, criminal and juvenile trials, the enormous number of expedited appeals, and the reporter shortages throughout the courts is hitting all of us hard, but our hope is to see the light at the end of the tunnel soon.

Sincerely,

Karla Michelle Soto
Verbatim Reporting & Transcription
(281) 724-8600
(520) 303-7356
<http://www.verbatimrt.com>



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