

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

2
3 IN THE MATTER OF THE
4 PARENTAL RIGHTS AS TO SV, A
5 MINOR CHILD

6 MARTINA CHRISTY VALENCIA,
7 Appellant,

8 v

9 JOHN G. EDWARDS
10 Respondent.

No: 83008

Electronically Filed
Mar 01 2022 11:15 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

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13 **EX PARTE MOTION FOR ADDITIONAL**
14 **TIME TO FILE OPENING BRIEF**

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16 Appellant, Martina Valencia, by and through her attorney Frank J
17 Toti Esquire, respectfully submits this request that she be granted
18 additional time to file her Opening Brief in this matter.
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20 Dated this 1 day of March, 2022

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25 FRANK J TOTI 005804
26 6900 Westcliff Drive #500
27 Las Vegas, Nevada 89145
28 Attorney for M. Valencia

POINTS AND AUTHORITIES

On February 28, 2022, the undersigned, on behalf of Appellant, Martina Valencia, filed Appellant's Appendix as well as Appellant's Child Custody Fast Track Statement. Also on February 28, 2022 the undersigned received Notice of Rejection of Filed Document from this Court stating that this matter was not a "Fast Track" matter and to submit a regular Opening Brief within five days of said notice. Pursuant to said notice, Appellant's Opening Brief would be due not later than March 4, 2022.

The undersigned will be out of the jurisdiction commencing March 2, 2022 and will not return to the jurisdiction until March 11, 2022. This Court has the authority to grant Appellant an extension of time to file her opening brief and appendix pursuant to *NRAP 3E(f)(3)* if extreme need or merit is demonstrated. Here, the undersigned simply will not have the ability to convert Appellant's Child Custody Fast Track Statement into a regular Opening Brief within the time prescribed by this Court.

1 The undersigned asks that an extension of time be granted to
2 convert Appellant's Child Custody Fast Track Statement into a regular
3 Opening Brief and that the undersigned be ordered to file and serve the
4 regular Opening Brief on or before March 16, 2022 (again Appellant's
5 Appendix has already be filed). As this is an appeal of Appellant's
6 parental rights being terminated, Respondent is not in any way
7 prejudiced by the granting of this request for an extension of time to
8 convert Appellant's Child Custody Fast Track Statement into a regular
9 Opening Brief.
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14 CONCLUSION

15 Based upon the foregoing, Appellant, Martina Valencia,
16 respectfully requests that this Court grant her request for an extension
17 of time to convert Appellant's Child Custody Fast Track Statement into
18 a regular Opening Brief and that the same be due on or before March 16,
19 2022.
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23 Dated this 1 day of March, 2022


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26 FRANK J TOTI 005804
27 6900 Westcliff Drive #500
28 Las Vegas, Nevada 89145
Attorney for M. Valencia

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4. This motion is made in good faith and not to delay justice.

FRANK J TOTI ESQUIRE

 MARINA GIRARD-VALDEZ
Notary Public-State of Nevada
APPT. NO. 04-90130-1
My Appt. Expires 07-07-2024

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