

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

2
3 HERMAN WILLIAMS,

4 Appellant,

5
6 v

7 NADINE WILLIAMS,

8 Respondent.
9

No: 83263

Electronically Filed
Apr 04 2022 09:40 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

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12 **EX PARTE MOTION FOR ADDITIONAL**
13 **TIME TO FAST TRACK RESPONSE**
14

15 Respondent, Nadine Williams, by and through her attorney Frank
16 J Toti Esquire, respectfully submits this request that she be granted
17 additional time to file her Fast Track Response in this matter.
18

19 Dated this 4 day of April, 2022
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24 FRANK J TOTI 005804
25 6900 Westcliff Drive #500
26 Las Vegas, Nevada 89145
27 Attorney for N. Williams
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1 POINTS AND AUTHORITIES

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4 On March 4, 2022, the Nevada Supreme Court granted Appellant's
5 fourth request for an extension of time to file his fast track statement and
6 appendix and further ordered that Respondent file her fast track
7 response would therefore be due on or before March 24, 2022.
8

9
10 This office inadvertently calendared the due date of Respondent's
11 fast track response for April 24, 2022 instead of March 24, 2022 and just
12 realized the error on April 1, 2022. This office immediately contacted
13 the Nevada Supreme Court and asked for a two week extension to file
14 Respondent's fast track response but since the March 24, 2022 due date
15 had already passed, the extension request via telecommunications was
16 denied and this office was directed to file a motion requesting an
17 extension to file Respondent's fast track response.
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21 The Nevada Supreme Court has the authority to grant Respondent
22 an extension of time to file her fast track response pursuant to *NRAP*
23 *3E(f)(3)* if extreme need or merit is demonstrated. Here, this office
24 inadvertently calendared the due date of Respondent's fast track
25 response for April 24, 2022 instead of March 24, 2022 and this office did
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1 not discover the error until April 1, 2022. Obviously with the due date
2 having passed, there is no ability for this office to file Respondent's fast
3 track response in a timely fashion.
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5 The undersigned asks that an extension of time be granted to file
6 Respondent's fast track response on or before April 18, 2022. This is
7 Respondent's first request for an extension of time to file her fast track
8 response while Appellant was granted four extensions to file his fast
9 track statement.
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12 **CONCLUSION**
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14 Based upon the foregoing, Respondent, Nadine Williams,
15 respectfully requests that this Court grant her request for an extension
16 of time to file her fast track response and that the same be due on or
17 before April 18, 2022.
18

19 Dated this 4 day of April, 2022
20

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22

23 FRANK J TOTI 005804
24 6900 Westcliff Drive #500
25 Las Vegas, Nevada 89145
26 Attorney for N. Williams
27
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1 AFFIDAVIT OF ATTORNEY

2 STATE OF NEVADA)
3) ss.
4 COUNTY OF CLARK)

5 FRANK J. TOTI, ESQ, being first duly sworn, says that:
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7 1. I am an attorney duly licensed to practice law in the State of
8 Nevada and I am the attorney for Respondent in the above-captioned
9 matter; that by virtue of that fact I have personal knowledge of the
10 matter contained herein and I am competent to testify to the same.
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12 2. I make this affidavit in support of the foregoing Ex Parte
13 Motion for Additional Time to File Respondent's Fast Track Response.
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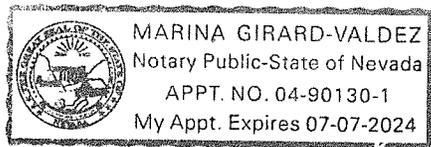
15 3. I have read said motion and hereby certify that the facts set
16 forth are true to the best of my knowledge and I believe them to be true.
17

18 4. This motion is made in good faith and not to delay justice.
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21 
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23 FRANK J TOTI ESQUIRE
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25 SUBSCRIBED and SWORN to before
26 me this 4th day of April, 2022

27 



28 NOTARY PUBLIC in and for said County and State.