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

3 AMANDA REED,
4 Appellant,

5 vs.

6 DEVIN REED,
7 Respondent.
8
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Electronically Filed
Dec 06 2021 04:45 p.m.
Elizabeth A. Brown
Clerk of Supreme Court
CASE NO. 83354
District Court Case No.
D-18-586055

10 **MOTION TO EXTEND TIME TO FILE APPELLANT'S FAST TRACK**
11 **STATEMENT AND APPENDIX**

12
13 Appellant, Amanda Reed, requests an extension of time to file her Fast Track
14 Statement and Joint Appendix pursuant to NRAP 31(b)(3)(C). For the reasons set forth
15 below, Amanda is requesting that her Fast Track Statement be due on January 10, 2022.
16

17 Initially, Amanda's Fast Track Statement was due December 6, 2021. A request
18 for an extension of time was made to the Clerk pursuant to NRAP 31(b)(1) and NRAP
19 3E(f)(2). However, because this appeal is pursuant to NRAP 3E, the Clerk was only able
20 to grant a 7 day extension, making Amanda's brief due December 13, 2021. No Motion
21 for an extension of time has been filed prior to this Motion.
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25 Good cause exists for Amanda's request for a further extension. Due to the nature
26 of this appeal, Amanda has requested the transcripts of six (6) separate hearings. The
27 transcript request was timely filed on November 9, 2021. However, none of the
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1 transcripts have yet been received. Undersigned counsel has reached out to Verbatim
2 Reporting and Transcription (“Verbatim”). Pursuant to that discussion, it is undersigned
3 counsel’s understanding that Verbatim believes that this Court has given Verbatim until
4 December 15, 2021, to produce those transcripts. Therefore, under the current deadlines,
5 Amanda will not even receive the transcripts until two (2) days after her Fast Track
6 Statement is due. Undersigned counsel is unable to prepare cogent brief without those
7 transcripts.

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9 In light of the number of transcripts necessary to this appeal, undersigned counsel
10 will need time once the same have been received to review the transcripts and prepare the
11 Fast Track Statement. Therefore, as the transcripts are due to be provided on December
12 15, 2021, according to Verbatim, undersigned counsel is requesting 25 days after receipt
13 of the transcripts to review the transcripts and prepare the brief.

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15 Undersigned counsel believes that extreme need and merit exist under NRAP
16 3E(f)(3) for this extension. Undersigned counsel cannot prepare the Fast Track Statement
17 without the requested transcripts. It is Verbatim’s position that they have been given a
18 deadline of December 15, 2021, to provide the transcripts. They have indicated that they
19 would *attempt* to have the transcripts finished earlier, but could not guarantee the same.
20 Upon receipt of the transcripts, undersigned counsel will need time to review all six
21 transcripts, and prepare the brief and appendix. Therefore, undersigned counsel is

1 requesting an extension until January 10, 2022, in which to prepare the Fast Track
2 Statement and Appendix on this matter. That will provide undersigned counsel 25 days,
3
4 after receiving the transcripts to review the same and prepare the brief and appendix.

5
6 Dated this 6 day of December, 2021.

7 KAINEN LAW GROUP, PLLC

8
9 By: 

10 RACHEAL H. MASTEL, ESQ.

11 Nevada Bar No. 11646

12 3303 Novat Street, Suite 200

13 Las Vegas, Nevada 89129

14 Attorney for Appellant
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NRAP 27(e) CERTIFICATE

1. The telephone numbers and office addresses for all counsel and unrepresented parties in this matter are:

CARRIE PRIMAS, ESQ.
(702) 901-4800
10000 W. Charleston Blvd., Ste 100,
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District Court Counsel for Appellant

RACHEAL H. MASTEL, ESQ.
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Counsel for Appellant

MICHANCY M. CRAMER, ESQ.
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197 E. California Ave, Ste 250,
Las Vegas, Nevada 89104.
District Court and Appellate Counsel for Respondent

There are no unrepresented parties in this appeal.

2. Verbatim Reporting has informed undersigned counsel's office that they will not provide the transcripts for the six (6) hearings requested until December 15, 2021, two (2) days after the Fast Track Statement is presently due. Undersigned counsel cannot prepare the brief without those transcripts. Upon receipt, undersigned counsel will need time to review the transcripts and prepare the brief. Undersigned counsel was not the district court counsel

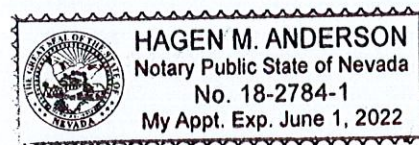
1 for Appellant, and therefore is unfamiliar with the specific details of each
2 hearing without reviewing the written transcripts.

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4 3. Because this is a Motion for Extension of Time to Serve the Fast Track
5 Statement, all counsel and litigants will be notified via service of this
6 Motion to the counsel listed above. Counsel will be served via the Court's
7 electronic filing system.
8

9
10 RACHEAL H. MASTEL, ESQ.

11 SUBSCRIBED AND SWORN to before me
12 this 6 day of December, 2021.

13
14 
15 NOTARY PUBLIC in and for said
16 County and State



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 6th day of December, 2021, I caused to be served the *Motion to Extend Time to File Appellant's Fast Track Statement and Appendix* to all interested parties as follows:

___ BY MAIL: Pursuant to NRCP 5(b), I caused a true copy thereof to be placed in the U.S. Mail, enclosed in a sealed envelope, postage fully prepaid thereon, addressed as follows:

___ BY CERTIFIED MAIL: I caused a true copy thereof to be placed in the U.S. Mail, enclosed in a sealed envelope, certified mail, return receipt requested, postage fully paid thereon, addressed as follows:

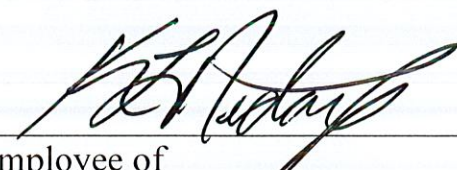
___ BY FACSIMILE: Pursuant to EDCR 7.26, I caused a true copy thereof to be transmitted, via facsimile, to the following number(s):

X BY ELECTRONIC MAIL: Pursuant to NRAP 25(c) and NEFCR Rule 9, I caused a true copy thereof to be served via electronic mail, via the Supreme Court Electronic Filing System.

Carrie Primas, Esq.

Michancy M. Cramer, Esq.

Alex Ghibaud, Esq.



An Employee of
KAINEN LAW GROUP, PLLC