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Electronically Filed
Feb 07 2022 11:48 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

IN THE SUPREME COURT FOR THE STATE OF NEVADA

AMANDA REED,

Appellant,

vs.

DEVIN REED,

Respondent.

Docket Number: 83354

**MOTION TO EXTEND TIME TO
FILE FAST TRACK RESPONSE**

COMES NOW Respondent, Devin Reed, through his attorney, Alex Ghibaudo, Esq. of the law firm of Alex B. Ghibaudo, PC and files the following motion:

MEMORANDUM OF POINTS AND AUTHORITIES

Appellant has submitted an extensive appendix of exhibits consisting of 1,548 over 7 volumes divided into multiple parts per volume. The case spans at just under four (4) years of litigation. To put it generously, the record is extensive. Indeed, it took undersigned counsel's staff almost a whole day and reams of paper to print and compile the file containing the exhibits.

According to trial counsel (undersigned's associate), there may be a dispute as to certain facts contained in Appellant's statement of facts and the actual record, or lack thereof, that require a thorough review of Appellant's exhibits and the record which, again, consists of 1,548 pages split into 7 volumes and several subparts to each volume (up to 8 subparts, for example, in volume 6). Undesigned counsel has endeavored to review the record in its entirety, and thoroughly, in the time allotted (21 days) to no avail. As such, undersigned now requests an extension of time to respond to the Fast Track Response to no later than Friday, February 11th, 2022.

LEGAL ANALYSIS

Under NRAP 3E(f)(3) this Court may extend the time to file a fast track statement/response if there is merit to the request. Here, the extent of the record and the shortened period of time provided made it extraordinarily difficult to review the entirety of the record compiled by Appellant and prepare the fast track response without rushing the matter to the detriment of Respondent.

CONCLUSION

For the foregoing reasons, and pursuant to the Rule cited above, there is merit to Respondent's request. Therefore, Respondent requests permission to file the necessary fast track response no later than February 11th, 2022.

Respectfully submitted this 7th day of February, 2022.

//s// Alex Ghibaud

Alex Ghibaud, Esq., Nevada Bar No. 10592
ALEX B. GHIBAUDO, PC

CERTIFICATE OF MAILING

Pursuant to NRAP 25(c)(1) and NEFCR 9, I certify that on the 7th day of February, 2022, that I caused to be served the foregoing MOTION TO EXTEND TIME TO FILE A FAST TRACK RESPONSE through the Nevada Supreme Court's electronic filing system to the following:

STEVEN EVENSON, ESQ.
101 N. Maine Street Fallon, NV 89406

Dated this 7th Day of February, 2022.

/s/ Alex Ghibaud, Esq.

Alex B. Ghibaud, PC