

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

AMY COLLEEN LUCIANO, N/K/A/
AMY HANLEY,

vs.

Respondent.

Supreme Court No. 8352 Electronically Filed
Oct 13 2021 11:35 a.m.
District Court Case No. Elizabeth A. Brown
Clerk of Supreme Court

DATED this 13th day of October, 2021.

The Law Offices of Charles R. Zeh, Esq.

By:

Pete Cladianos III, Esq.

The Law Offices of Charles R. Zeh, Esq.
50 West Liberty Street, Suite 950
Reno, NV 89509
Phone: 775.323.5700
Email: crzeh@aol.com

Docket 83522 Document 2021-29407

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I certify that I am an employee of The Law Offices of Charles R. Zeh, Esq., and that on this date I served the attached *Motion to Extend Time for the Filing of the Docketing Statement (First Request)*, on those parties identified below by placing an original or true copy thereof in a sealed envelope, postage prepaid, placed for collection and mailing in the United States Mail, at Reno, Nevada:

Julio Vigoreaux, Jr., Esq.
The Law Office of Julie Vigoreaux, Jr.
400 S. 4th Street, Suite 500
Las Vegas, NV 89101

Ara H. Shirinian, Esq.
Ara Shirinian Mediation
10651 Capesthorne Way
Las Vegas, NV 89135

Dated this 13th day of October, 2021.



/s/Karen Kennedy

An Employee of
The Law Offices of Charles R. Zeh, Esq.

S:\Clients\Hanley, Amy\Motion.Extend time.filing.docketing.statement.R1.wpd

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

2

3
4

5

6

7

8

3
4

90

1

2
3
4
5
6
7
8
9
0

21
22
23
24
25
26
27

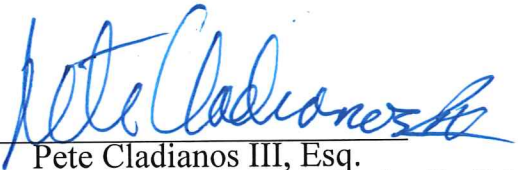
8

1 Arrangements have been made for the Appeals Department to send the entire case file to
2 the Appellant's attorneys as a CD ROM. PC3 ¶ 12. The record was to be sent on Tuesday,
3 October 12, 2021. PC3 ¶ 13. However, Appellant's attorneys will not receive it until later in the
4 week because time will be required for mailing. PC3 ¶ 14. This record, in whole or in part, is a
5 requirement of the Docketing Statement. PC3 ¶ 15. Specifically, the Appellant is required to
6 attach file stamped copies of pleadings, motions, the associated notices of entry of orders and
7 proofs of services. PC3 ¶ 16. This is a requirement which Appellant cannot meet until after the
8 deadline for the filing of the Docketing Statement. PC3 ¶ 17. Moreover, legal counsel needs
9 time to review the record to determine the validity of the actions of the lower court. PC3 ¶ 18.

10 Based on the above, good cause is shown for an extension of time pursuant to Rule 14(d)
11 NRAP. Counsel for Appellant requests the deadline for the filing of the docketing statement be
12 extended by 21 days until November 3, 2021. This is the first request for an extension of time in
13 this matter and is not made for the purpose of delay or harassment.

14 The undersigned does hereby affirm that pursuant to NRS 239B.030, the preceding
15 document does not contain the social security number of any person.

16 DATED this 13th day of October, 2021. The Law Offices of Charles R. Zeh, Esq.

17
18
19
20 By: 
21 Pete Cladianos III, Esq.
22 The Law Offices of Charles R. Zeh, Esq.
23 50 West Liberty Street, Suite 950
24 Reno, NV 89509
25 Phone: 775.323.5700
26 Email: crzeh@aol.com

27
28
Attorneys for Appellant

CERTIFICATE OF SERVICE

I certify that I am an employee of The Law Offices of Charles R. Zeh, Esq., and that on this date I served the attached *Points and Authorities in Support of Motion to Extend Time for the Filing of the Docketing Statement (First Request)*, on those parties identified below by placing an original or true copy thereof in a sealed envelope, postage prepaid, placed for collection and mailing in the United States Mail, at Reno, Nevada:

Julio Vigoreaux, Jr., Esq.
The Law Office of Julie Vigoreaux, Jr.
400 S. 4th Street, Suite 500
Las Vegas, NV 89101

Ara H. Shirinian, Esq.
Ara Shirinian Mediation
10651 Capesthorpe Way
Las Vegas, NV 89135

Dated this 13th day of October, 2021.



/s/Karen Kennedy

An Employee of
The Law Offices of Charles R. Zeh, Esq.

S:\Clients\Hanley, Amy\PA Motion to Extend.R4.wpd

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

**AMY COLLEEN LUCIANO, N/K/A/
AMY HANLEY,**

Appellant,

VS.

FRANK LUCIANO,

Respondent.

Supreme Court No. 83522

District Court Case No. D598320

Pete Cladianos III, Esq., hereby swears and affirms under penalty of perjury, that the following assertions are true of my own personal knowledge except those allegations I make upon information and belief and as to those allegations, I believe them to be true:

2. This appeal arises out of a divorce and child custody case. Appellant represented herself in these proceedings.

4. A trial of the matter occurred on May 19, 2020. The Appellant was not in attendance.

6. Respondent was granted full custody of the couples' seven year old daughter. Appellant was given no visitation rights and ordered to make child support payments.

8. This law firm was engaged in September of 2021 and provided its Notice of Appearance on September 7, 2021.

1

1 9. Upon becoming attorney of record, the Appellant's legal counsel discovered that
2 there was only access to certain documents in the lower court proceedings.

3 10. I and members of our firm undertook efforts to access the entire case file.

4 11. On Monday the 11th of October, 2021, contact was made with the Appeals
5 Department of the District Court Clerk's Office in Clark County which is to supply the entire
6 record of the proceedings in the District Court.

7 12. Arrangements have been made for the Appeals Department in Clark County to
8 send the entire case file to the Appellant's attorneys as a CD ROM.

9 13. The record was to be sent on Tuesday, the 12th of October, 2021.

10 14. Appellant's legal counsel will not receive it until later in the week because time
11 will be required for mailing.

12 15. This record, in whole or in part, is a requirement of the Docketing Statement.

13 16. Specifically, the Appellant's attorneys are required to attach file stamped copies of
14 pleadings, motions, associated notices of entry of orders and the proof of service thereof.

15 17. This is a requirement which Appellant's attorneys cannot meet until after the
16 deadline for the filing of the Docketing Statement.

17 18. Moreover, legal counsel needs time to review the record to determine the validity
18 of the actions of the lower court.

19
20 Dated this 13th day of October, 2021.


Pete Cladianos III, Esq.


CERTIFICATE OF SERVICE

I certify that I am an employee of The Law Offices of Charles R. Zeh, Esq., and that on this date I served the attached *Declaration of Pete Cladianos III, Esq.*, on those parties identified below by placing an original or true copy thereof in a sealed envelope, postage prepaid, placed for collection and mailing in the United States Mail, at Reno, Nevada:

Julio Vigoreaux, Jr., Esq.
The Law Office of Julie Vigoreaux, Jr.
400 S. 4th Street, Suite 500
Las Vegas, NV 89101

Ara H. Shirinian, Esq.
Ara Shirinian Mediation
10651 Capesthorne Way
Las Vegas, NV 89135

Dated this 13th day of October, 2021.


/s/Karen Kennedy
An Employee of
The Law Offices of Charles R. Zeh, Esq.

S:\Clients\Hanley, Amy\Dec of PC.R5.wpd