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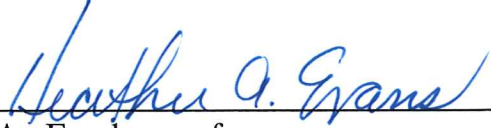
CERTIFICATE OF SERVICE

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 *Second Motion to Extend Time for the Filing of the Docketing Statement*, 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 3rd day of November, 2021.


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

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

Appellant,

vs.

FRANK LUCIANO,

Respondent.

Supreme Court No. 83522
District Court Case No. D598320

Appellant moves for a second extension of time to file the Docketing Statement pursuant to Rule 14(d), NRAP. Additional time is needed as a result of two events, both of which were out of the control of the Appellant's legal counsel. The first is that the time required for the mailing of the lower court records far exceeded anyone's expectations. Declaration of Pete Cladianos III, Esq., "Cladianos Dec." ¶¶ 2, 3. Second, within twenty-four hours of receipt of the lower court records legal counsel became severely ill. Cladianos Dec. ¶ 4. Both events are explained more fully below.

On October 13, 2021, the attorneys for the Appellant made their first request for an extension of time to file the Docketing Statement. The reason for the request was that the full record from the lower court was not expected to be supplied until after the date that the Docketing Statement was due. Cladianos Dec. ¶ 5. The lower court records could not be sent electronically because of their extensive size, consisting of 144 filed documents. Cladianos Dec. ¶ 6. Possession of the lower court records was necessary for the filing of the Docketing Statement because paragraph 27 of the form for the Docketing Statement requires copies of the complaint, tolling motions, all challenged orders and the associated notices of entry of orders for each. Cladianos Dec. ¶ 7.

The lower court records were assembled on Monday, October 11, 2021 and mailed the next day. Exhibit 1 and Cladianos Dec. ¶ 8. Inexplicably, it took more than two weeks to receive

1 the records. Exhibit 2 and Cladianos Dec. ¶¶ 2, 3. After receipt of the records, legal counsel
2 needed time to assemble the documents for the Docketing Statement. Cladianos Dec. ¶ 9.

3 This review of the records could not be conducted as the result of the sudden onset of an
4 illness. Cladianos Dec. ¶ 10. Specifically, on the afternoon of Thursday, October 28, I began to
5 experience body aches and fatigue caused me to leave my office both because I could not
6 concentrate on my work and I did not want to risk infecting my co-workers. Cladianos Dec. ¶ 4.
7 Believing the illness to be COVID 19, I scheduled a COVID test with CVS pharmacy on Monday
8 the 1st of November which was the first available date. Cladianos Dec. ¶ 11. On November 1st I
9 took the pharmacy test and it provided a negative result. Cladianos Dec. ¶ 12. It was a relief that
10 the illness was not COVID 19, however I was still too ill to return to the office that day or
11 Tuesday. Cladianos Dec. ¶ 13. I returned to the office on November 3rd in order to complete this
12 motion. Cladianos Dec. ¶ 14. I've informed opposing counsel of my illness and he agreed to an
13 extension of time of ten days for the filing of the Docketing Statement. Cladianos Dec. ¶ 15.

14 Based on the above, good cause is shown for an extension of time pursuant to Rule 14(d)
15 NRAP. Counsel for Appellant requests the deadline for the filing of the Docketing Statement be
16 extended by 10 days until November 12, 2021. This is the second request for an extension of
17 time in this matter and is not made for the purpose of delay or harassment.

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

20 DATED this 3rd day of November, 2021. The Law Offices of Charles R. Zeh, Esq.

21
22 By: /s/Pete Cladianos III, Esq.
23 Pete Cladianos III, Esq.
24 The Law Offices of Charles R. Zeh, Esq.
25 50 West Liberty Street, Suite 950
26 Reno, NV 89509
27 Phone: 775.323.5700
28 Email: crzeh@aol.com
Attorneys for Appellant

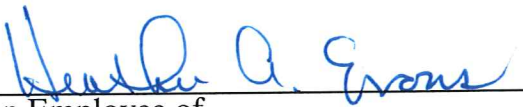
CERTIFICATE OF SERVICE

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 Second Motion to Extend Time for the Filing of the Docketing Statement*, 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 3rd day of November, 2021.


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

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

2 * * * * *

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

5 **Appellant,**

6 **vs.**

7 **FRANK LUCIANO,**

8 **Respondent.**

Supreme Court No. 83522

District Court Case No. D598320

9 **DECLARATION OF PETE CLADIANOS III, ESQ.**

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

13 1. I am one of the attorneys for the Appellant in the above-captioned case.
14 2. The lower court records were sent on Tuesday, October 12, 2021.
15 3. Inexplicably, the records were not received at our firm's office until the afternoon
16 of Wednesday October 27, over two weeks after the date of mailing.

17 4. On the afternoon of Thursday, October 28, I began to experience body aches and
18 fatigue causing me to leave my office both because I could not concentrate on my work and I did
19 not want to risk infecting my co-workers.

20 5. Attorneys for the Appellant requested the first extension of time to file the
21 Docketing Statement on October 13, 2021. The reason for the request was that the full record
22 was not expected to be supplied until after the date that the Docketing Statement was due.

23 6. This case has an extensive record consisting of 144 filed documents in the lower
24 court. It could not be emailed as result of the large number of documents.

25 7. The Docketing Statement must include file stamped copies of the relevant
26 pleadings, motions, the associated notices of entry of orders and the proofs of services.

27 8. The lower court records were assembled on Monday, October 11, 2021 and
28 mailed the next day.

9. After receipt of the record, legal counsel needed time to review the record to determine the validity of the actions of the lower court.

10. However, this review of the record could not be conducted as the result of my illness.

11. Believing my illness to be COVID 19, I scheduled a COVID test with CVS pharmacy on the first available date which was Monday the 1st of November.

12. On November 1st I took the pharmacy administered test which gave a negative reading.

13. Not having Covid was a relief. However, I was still too ill to return to my office that day or the next.

14. I returned to my office on the 3rd of November in order to complete the Second Motion to Extend Time for the Filing of the Docketing Statement.

15. I informed opposing counsel of my illness and he agrees to an extension of time ten days until November 12, 2021, to file the Docketing Statement.

16. Exhibit 1 to the Points and Authorities in Support of the Second Motion to Extend Time for the Filing of the Docketing Statement is a true and correct copy of the October 11, 2021, letter from the Eighth Judicial District Court.

17. Exhibit 2 to the Points and Authorities in Support of the Second Motion to Extend Time for the Filing of the Docketing Statement is a true and correct copy of the USPS Tracking Result for the dockets from the Eighth Judicial District Court.

Dated this 3rd day of November, 2021.

/s/Pete Cladianos III, Esq.
Pete Cladianos III, Esq.

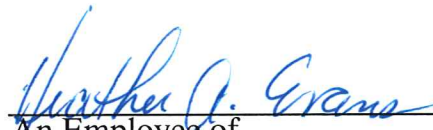
CERTIFICATE OF SERVICE

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 3rd day of November, 2021.


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

S:\Clients\Hanley, Amy\Dec 2nd.of PC.R4.wpd

Exhibit List

No.	Document	Page(s)
Exhibit 1.	Letter from the Eighth Judicial District Court verifying the date the CD of files was sent from their office.	1
Exhibit 2.	Tracking Receipt from the Post Office specifying when the CD of Files from the Court was dropped off at Appellants lawyers office.	1

Exhibit 1



**EIGHTH JUDICIAL DISTRICT COURT
CLERK OF THE COURT**

REGIONAL JUSTICE CENTER
200 LEWIS AVENUE, 3rd FL.
LAS VEGAS, NEVADA 89155-1160
(702) 671-4554

Steven D. Grierson
Clerk of the Court

Anntoinette Naumec-Miller
Court Division Administrator

October 11, 2021

Peter Cladianos, III, Esq.,
The Law Offices of Charles R. Zeh, Esq.
50 W. Libery St., Suite 950
Reno, NV 89501

RE: FRANK LUCIANO vs. AMY LUCIANO
D.C. CASE: D-19-598320-D – **SEALED**

Enclosed is a CD containing digital copies of the 144 filed documents in the above referenced case. Also included is a copy the case summary and case minutes.

If you have any questions or need additional information, please contact me at (702) 671-0512.

Sincerely,
STEVEN D. GRIERSON, CLERK OF THE COURT

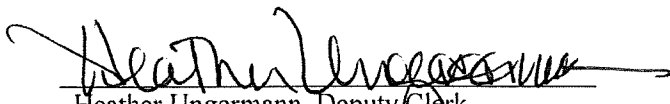

Heather Ungermann, Deputy Clerk

Exhibit 2

USPS Tracking®

Track Another Package +

Remove X

Tracking Number: 70112970000429631938

Your item was delivered to the front desk, reception area, or mail room at 1:09 pm on October 27, 2021 in RENO, NV 89501.

 **Delivered, Front Desk/Reception/Mail Room**

October 27, 2021 at 1:09 pm
RENO, NV 89501

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Product Information	▾

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FAQs