IN THE SUPREME COURT OF THE STATE OF NEVADA

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AMY COLLEEN LUCIANO, N/K/A/

vs.

Appellant,

Respondent.

AMY HANLEY,

FRANK LUCIANO,

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Supreme Court No. 83 Electronically Filed Mar 15 2022 04:39 p.m.

District Court Case No Elizabeth A. Brown

District Court Case No.

Elizabeth A. Brown Clerk of Supreme Court

MOTION TO EXTEND TIME TO FILE THE FAST TRACK REPLY

COMES NOW, Amy Colleen Luciano, N/K/A/ Amy Hanley, by and through Pete Cladianos III, Esq., The Law Offices of Charles R. Zeh, Esq., legal counsel and hereby moves this Court for an extension of time up to and including March 16, 2022, as the time within which to file the Reply to Respondent's Fast Track Response. The Reply was ready yesterday March 14, 2022, and waiting for comments from client which she was unable to provide as the result of her child's illness. Legal Counsel believed that the Reply was not due until today, Tuesday, March 15, 2022. This is the first request for an extension of time by the parties to file the transmittal of proceedings and the record on appeal and is not brought to delay the proceedings.

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POINTS AND AUTHORITIES IN SUPPORT OF MOTION TO EXTEND TIME TO FILE THE FAST TRACK REPLY

The reason for this request to extend time is that legal counsel assumed that the due date for the Reply was today, March 15, 2022. This error occurred as the result of reasonable grounds, as set forth below.

On January 26, 2022, Appellant's Fast Track Statement was filed after a requested seven day extension. This would have made Respondent's Response due on February 16, 2022.

On February 11, 2022, Respondent requested an additional seven days to file his Response.

On February 23, 2022, Appellant received Respondent's Fast Track
Response in the regular mail. However, the Response was not filed with the Court
on that date.

On February 28, 2022, Respondent's Fast Track Response was filed with this Court and received electronically by the Appellant. It should be noted the Respondent did not request additional time to file the Fast Track Response and this Court did not issue an order allowing the Respondent to file a late Response.

Based upon this confusing set of events, counsel for Appellant believed that not counting the day of service, February 28, 2022 would cause the Fast Track Reply to be due on Tuesday March 15, 2022. However, in a call to the Court

today, counsel for Appellant was informed that the Court regarded the Reply as due on March 14, 2022. Accordingly, this Motion is required to extend the deadline for filing.

Based upon the above, Appellant respectfully requests two additional days to file Fast Track Reply, *i.e*, until the end of the business day on March 16, 2022 and for any additional relief that is necessary and proper in the premises.

The undersigned hereby affirms that the preceding document filed in the above-entitled Court does not contain the social security number of any person.

Dated this 15th day of March, 2020.

The Law Offices of Charles R. Zeh, Esq.

By: /s/ Pete Cladianos III, Esq.

Pete Cladianos III, Esq.

The Law Offices of Charles R. Zeh, Esq.

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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 Motion to Extend Time to File the Fast Track Reply, 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, as well as, by email to the address below: Julio Vigoreaux, Jr., Esq. The Law Office of Julie Vigoreaus, Jr. 400 S. 4th Street, Suite 500 Las Vegas, NV 89101 Email Address: Julio Vigoreaux, Jr., Esq. - jvigoreaux@gmail.com Dated this 15th day of March, 2022. /s/ Heather Evans An Employee of The Law Offices of Charles R. Zeh, Esq. S:\Clients\Hanley, Amy\Fast Track Statement\Motion.extend.time.R3.wpd