IN THE SUPREME COURT OF THE STATE OF NEVADA

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ERICH M. MARTIN Appellant,	Supreme Court Electronically Filed Mar 28 2022 04:54 p.m. Elizabeth A. Brown Clerk of Supreme Court
vs.	
RAINA L. MARTIN,	
Respondents.	
ERICH M. MARTIN	Supreme Court No. 82517
Appellant,	
VS.	
RAINA L. MARTIN,	
Respondents.	

MOTION FOR EXTENSION OF TIME TO FILE AMICUS CURIAE BRIEF

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Attorneys for Trinity Advocates

Trinity Advocates is a non-profit organization dedicated to ensuring that military servicemembers, veterans, and their families have consistent, fair, and equal treatment under the Constitution and laws of the United States. Trinity Advocates intends to request permission to participate as an amicus curiae in this appeal and respectfully requests that this Court grant this Motion for Extension of Time to File Amicus Curiae Brief pursuant to NRAP 29(f).

This Court's Order Granting Petition for Review, Directing Supplemental Briefing and Inviting Amicus Brief, filed on February 14, 2022 determined that the "participation of amicus curiae" may assist the "court's resolution of this matter." As Trinity Advocates intends, if permitted, to file an amicus brief supporting Appellant, its amicus brief would otherwise be due on March 28, 2022 as Appellant's Supplemental Brief was filed on March 21, 2022. NRAP 29(f). By this Motion, Trinity Advocates requests an additional week (7 days) until April 4, 2022 to file its amicus brief. Additionally, during this time period Trinity Advocates will also endeavor to obtain the consent of the parties to its submission, and if unsuccessful, will file a motion for leave to file an amicus brief on April 4, 2022 together with its proposed brief. NRAP 29(a).

Alternatively, Trinity Advocates joins the Motion for Extension of Time to File Amicus Curiae Brief that was submitted by the Family Law Section of the State Bar of Nevada on March 14, 2022. The Family Law Section requested an extension of time "to 30 days after Respondent's Supplemental Answering Brief is filed." If the Court is so inclined, then Trinity Advocates would also file its proposed amicus brief at this same time.

This request is the first and will be the only request of Trinity Advocates for an extension of time to file its Brief of Amicus Curiae and, if necessary, Motion for Leave to File Brief of Amicus Curiae. This request is for good cause, and not for the purposes of delay, as it would allow Trinity Advocates to fully review the case and issues on appeal and finish preparing a submission that would assist the Court's resolution of the matter.

Trinity Advocates, therefore, respectfully requests an extension of time for one week until April 4, 2022 or, in the alternative if the Family Law Section's Motion for Extension is granted, an extension of time to 30 days after Respondent's Supplemental Answering Brief is filed to file its Brief of Amicus

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Curiae and, if necessary, Motion for Leave to File Brief of Amicus Curiae.

Respectfully submitted March 28, 2022.

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Attorneys for Trinity Advocates

CERTIFICATE OF SERVICE

I hereby certify that the foregoing MOTION FOR EXTENSION OF TIME TO FILE AMICUS CURIAE BRIEF was filed electronically with the Nevada Supreme Court on the 28th day of March, 2022. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Chad F. Clement Kathleen A. Wilde Marquis Aurbach 10001 Park Run Drive Las Vegas, Nevada 89145 Marshall S. Willick Willick Law Group 3591 E. Bonanza Road, Suite 200 Las Vegas, Nevada 891001

I further certify that I served a copy of this document by

mailing a true and correct copy thereof, postage prepaid, addressed to:

James Barnes, Chair Family Law Section State Bar of Nevada c/o Viloria Oliphant Oster Aman 327 California Avenue Reno, Nevada 89509 Kimberly Farmer Executive Director State Bar of Nevada 3100 W. Charleston Blvd. Suite 100 Las Vegas, NV 8902

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> <u>/s/ Pamela Miller</u> An Employee of McDonald Carano LLP

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