

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

ANDREW WARREN,

Appellant,

v.

AIMEE JUNG AHYANG,

Respondent.

Electronically Filed  
Sep 07 2021 02:13 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

Supreme Court No.: 82909

District Court No.: D-19-590407-C

**APPELLANT’S MOTION FOR EXTENSION OF TIME TO FILE FAST  
TRACK STATEMENT AND APPENDIX**

COMES NOW, Appellant, Andrew Warren, by and through his attorney, Emily McFarling, Esq. of McFarling Law Group, and hereby requests an Order extending the time to file his Fast Track Statement and Joint Appendix. This Motion is based upon the Memorandum of Points and Authorities, Declaration of Emily McFarling, Esq., and all other papers and pleadings on file herein.

DATED this 7<sup>th</sup> day of September, 2021.

**McFARLING LAW GROUP**

/s/ Emily McFarling

Emily McFarling, Esq.  
Nevada Bar Number 8567  
6230 W. Desert Inn Road  
Las Vegas, NV 89146  
(702) 565-4335  
*Attorney for Appellant,  
Andrew Warren*

## **MEMORANDUM OF POINTS AND AUTHORITIES**

Pursuant to NRAP 3E, either party may request, by telephone, a 7-day extension of time for filing a fast track statement or response and any subsequent requests for an extension of time must be made by written motion to the court. The motion must justify the requested extension in light of the time limits provided in this Rule and shall specify the exact length of the extension requested. Furthermore, extensions of time for the filing of fast track statements and responses shall be granted only upon demonstrating of extreme need or merit.

Per the Court's order, the Fast Track Statement and Appendix are currently due September 7, 2021. No requests have been made thus far. The original Fast Track Statement and Appendix are due September 7, 2021.

Appellant needs an extension to file the Fast Track Statement and Appendix because he does not have the necessary transcripts yet. On August 5, 2021, Appellant requested transcripts of proceedings from the trial and multiple hearings in the district court matter, and after receiving the estimate for transcripts, paid the deposit. McFarling Law Group's staff spoke to Michael at Verbatim Reporting and it is estimated that the transcripts will be completed by September 13, 2021.

Without the transcripts, Appellant is unable to finalize the Fast Track Statement and Joint Appendix as those proceedings led to the Findings of Fact,

Conclusions of Law and Orders and Reconsideration denial that is subject to this appeal. Therefore, Appellant believes these reasons demonstrate extreme need.

As such, Appellant respectfully requests a 45-day extension to the file the Fast Track Statement and Appendix—specifically the Fast Track Statement and Joint Appendix would be due October 22, 2021.

DATED this 7<sup>th</sup> day of September, 2021.

**McFARLING LAW GROUP**

*/s/ Emily McFarling*

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Emily McFarling, Esq.  
Nevada Bar Number 8567  
6230 W. Desert Inn Road  
Las Vegas, NV 89146  
(702) 565-4335  
*Attorney for Appellant,  
Andrew Warren*

**DECLARATION EMILY MCFARLING, ESQ.**

I, Emily McFarling, Esq., declare under penalty of perjury under the laws of the State of Nevada that the following is true and correct:

1. I represent the Appellant in the above-entitled case.
2. I have read the attached motion and know the contents thereof; the same is true of my own knowledge, except for those matters stated upon information and belief and, as to those matters, I believe them to be true.

I declare under penalty of perjury, under the laws of the State of Nevada and the United States (NRS 53.045 and 28 USC § 1746), that the foregoing is true and correct.

DATED this 7<sup>th</sup> day of September, 2021.

**MCFARLING LAW GROUP**

/s/ Emily McFarling

Emily McFarling, Esq.  
Nevada Bar Number 8567  
6230 W. Desert Inn Road  
Las Vegas, NV 89146  
(702) 565-4335  
*Attorney for Appellant*  
*Andrew Warren*

## **CERTIFICATE OF SERVICE**

I, an employee of McFarling Law Group, hereby certify that on the 7<sup>th</sup> day of September, 2021, I served a true and correct copy of Appellant's Motion for Extension of Time to Fast Track Statement and Appendix as follows:

☒ via the Supreme Court's electronic filing and service system (eFlex):

Pecos Law Group  
Alicia Exley, Esq  
Bruce Shapiro, Esq.  
[bruce@pecoslawgroup.com](mailto:bruce@pecoslawgroup.com)

/s/ Alex Aguilar  
Alex Aguilar