

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

BRADLEY JOHN BELLISARIO,

Appellant,

v.

EMILY BELLISARIO,

Respondent.

Electronically Filed  
Mar 07 2022 05:15 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

Supreme Court No.: 84128

District Court No.: D605263

**APPELLANTS'S MOTION FOR EXTENSION OF TIME TO FILE BRIEF  
AND APPENDIX**

COMES NOW, Appellant, Bradley John Bellisario, by and through his attorney, Amy A. Porray, Esq. of McFarling Law Group, and hereby requests an Order extending the time to file the Fast Track Statement. This Motion is based upon the Memorandum of Points and Authorities, Declaration of Amy A. Porray, Esq., and all other papers and pleadings on file herein.

DATED this 7th day of March, 2022.

**McFARLING LAW GROUP**

/s/ Amy A. Porray

Amy A. Porray, Esq.  
Nevada Bar Number 9596  
6230 W. Desert Inn Road  
Las Vegas, NV 89146  
(702) 565-4335

*Attorney for Appellant,  
Bradley John Bellisario*

## **MEMORANDUM OF POINTS AND AUTHORITIES**

Under NRAP 26(b), for good cause, the Court may extend time to perform any act prescribed in the Nevada Rules of Appellate Procedure. On or before the due date sought to be extended, a party may request by telephone a single 14-day extension of time, and if good cause is shown, the clerk may grant such request by telephone. However, for any further extensions of time, the party must file a written motion for an extension of time demonstrating extraordinary and compelling circumstances why a further extension of time is necessary.

Motions for extensions of time are governed by Rule 31(b). Subsection (3) of said Rule states that the motion shall include the following:

- (i) The date when the brief is due;
- (ii) The number of extensions of time previously granted (including a 14-day telephonic extension), and if extensions were granted, the original date when the brief was due;
- (iii) Whether any previous requests for extensions of time have been denied or denied in part;
- (iv) The reasons or grounds why an extension is necessary (including demonstrating extraordinary and compelling circumstances under Rule 26(b)(1)(B), if required); and
- (v) The length of the extension requested and the date on which the brief would become due.

Per the Court's order, the Fast Track Statement (FTS) and Appendix are currently due on March 7, 2022. Bradley has not requested a 14-day extension

because the transcripts are not yet prepared. Requesting a telephonic extension is futile.

Bradley needs an extension to file the FTS and appendix because the transcripts have not been completed. Bradley has spoken with the transcription service who estimates that the transcripts will be completed on Friday, March 11, 2022. Bradley's appeal involves several issues, as it is a heavily contested divorce and custody matter. There are multiple pre-trial hearings, resulting in appealable orders. Based on the transcript cost alone, Bradley expects the transcripts are lengthy. Appellate counsel was not trial counsel, thus lengthening the transcript review. These reasons show an extraordinary and/or compelling circumstance.

Bradley assumes the transcripts will be prepared by the date given. As such, Bradley respectfully requests a 30-day extension to the file the FTS and Appendix—specifically the FTS and Appendix would be due April 6, 2022. This motion is brought in good faith and not for purposes of delay.

DATED this 7th day of March, 2022.

**McFARLING LAW GROUP**

/s/ Amy A. Porray

Amy A. Porray, Esq.  
Nevada Bar Number 9596  
6230 W. Desert Inn Road  
Las Vegas, NV 89146  
(702) 565-4335  
*Attorney for Appellant,  
Bradley John Bellisario*

**DECLARATION OF AMY A. PORRAY, ESQ.**

I, Amy A. Porray, 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 7th day of March, 2022.

**McFARLING LAW GROUP**

/s/ Amy A. Porray

Amy A. Porray, Esq.  
Nevada Bar Number 9596  
6230 W. Desert Inn Road  
Las Vegas, NV 89146  
(702) 565-4335  
*Attorney for Appellant*  
*Bradley John Bellesario*

## VERIFICATION

The undersigned counsel of record certifies as follows: I hereby certify that this motion complies the requirements of NRAP 27, has been prepared in a proportionally spaced typeface using Microsoft Word–Office 365 Business in font type Times New Roman size 14, and is less than 10 pages long. I also certify that the information provided in this motion is true and complete to the best of my knowledge, information, and belief.

DATED this 7th day of March, 2022.

### **MCFARLING LAW GROUP**

/s/ Amy A. Porray

Amy A. Porray, Esq.  
Nevada Bar Number 9596  
6230 W. Desert Inn Road  
Las Vegas, NV 89146  
(702) 565-4335  
*Attorney for Appellant,  
Bradley John Bellisario*

## NRAP 26.1 STATEMENT

The undersigned counsel of record certifies that the following are persons and entities as described in NRAP 26.1 (a) and must be disclosed. These representations are made in order that the justices of this Court may evaluate possible disqualification or recusal.

1. All parent corporations and publicly held companies owning 10 percent or more of the party's stock: N/A

2. Names of all law firms whose attorneys have appeared for the party or amicus in this case (including proceedings in the district court or before an administrative agency) or are expected to appear in this Court:

**Roberts Stoffel**, Amanda Roberts, Esq.

**McFarling Law Group**, Emily M. McFarling, Esq. and Amy A. Porray, Esq.

**Marathon Law Group**, Joseph W. Riccio and Kristina C. Kirgin

**Tilman Law Office**, Christopher R. Tilman

///

///

///

3. If litigant is using a pseudonym, the litigant's true name: None.

DATED this 7th day of March, 2022.

**McFARLING LAW GROUP**

/s/ Amy A. Porray

Amy A. Porray, Esq.  
Nevada Bar Number 9596  
6230 W. Desert Inn Road  
Las Vegas, NV 89146  
(702) 565-4335  
*Attorney for Appellant,  
Bradley John Bellisario*

### **CERTIFICATE OF SERVICE**

I, an employee of McFarling Law Group, hereby certify that on the 7th day of March, 2022, I served a true and correct copy of Appellant's Motion for Extension of Time to File Brief and Appendix as follows:

☒ by United States mail in Las Vegas, Nevada, with First-Class postage prepaid and addressed as follows:

Emily Bellisario  
1913 Sondrio Drive  
Las Vegas, NV 89134

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

Amanda Roberts  
efile@lvfamilylaw.com

/s/ Crystal Beville  
Crystal Beville