

Alex B. Ghibaudo, Esq. Nevada Bar No. 10592 Michancy M. Cramer, Esq. Nevada Bar No. 11545 **ALEX GHIBAUDO, PC** 197 E California Ave, Ste 250

Las Vegas, Nevada 89104

T: (702) 462-5888 F: (702) 924-6553

E: alex@glawvegas.com *Attorney for Defendant* 

Electronically Filed Jan 25 2021 11:07 p.m. Elizabeth A. Brown Clerk of Supreme Court

#### IN THE SUPREME COURT FOR THE STATE OF NEVADA

ALEX GHIBAUDO,

Appellant,

VS.

TARA KELLOGG,

Respondent.

MOTION TO EXTEND TIME TO FILE DOCKETING STATEMENT

Docket Number: 82248

COMES NOW Appellant, Alex Ghibaudo, through his attorney, Michancy Cramer, Esq. of the law firm of Alex B. Ghibaudo, PC and files the following motion:

# **MEMORANDUM OF POINTS AND AUTHORITIES**

Under NRAP 26(b)(1)(A) this Court may extend the time prescribed by its Rules or by its order to perform any act, or may permit an act to be done after that time expires, upon a showing of good cause. Here, Appellant requires additional time to file his docketing statement due to the complexity of the issues and the fact

that a complete review of the extensive video record is required in order to properly address all issues existing in this appeal.

Counsel anticipates no more than an additional two (2) weeks to prepare and submit the docketing statement in this matter. There is no prejudice to Respondent as the settlement conference in this matter is set for March 3, 2021, well ahead of the date that Counsel requests for completion of the docketing statement.

### **CONCLUSION**

For good cause shown, undersigned counsel requests until February 8, 2021 to file his docketing statement.

Respectfully submitted this 25<sup>th</sup> day of January, 2021.

# /s/ Michancy Cramer

\_\_\_\_

Michancy M. Cramer, Esq. Nevada Bar No. 11545

# ALEX B. GHIBAUDO, PC

197 E. California Ave., Suite 250

Las Vegas, Nevada 89104 Telephone: (702) 978-7090

Facsimile: (702) 924-6553

Email: michancy@glawvegas.com

Attorney for Defendant