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Elizabeth A. Brown  
Clerk of Supreme Court

**IN THE SUPREME COURT OF NEVADA**

ALEX GHIBAUDO,

Appellant,

vs.

TARA KELLOGG,

Respondent.

Case No.: 82248

**APPELLANT'S FIRST  
MOTION TO EXTEND TIME  
TO FILE AN OPENING  
BRIEF AND APPENDIX**

COMES NOW, Alex Ghibaudo ("Appellant"), through his attorney of record, Michancy Cramer, Esq., of Alex B. Ghibaudo, P.C. and files this motion as follows:

**Memorandum of Points and Authorities**

**I. SUMMARY OF FACTS**

The opening brief and appendix in this matter is due today, August 26, 2021. However, the transcripts requested by Appellant were requested on July 13, 2021,



but were not received until August 24, 2021. In addition, Respondent's attorney recently withdrew representation and this Court directed Respondent to hire a new lawyer within 30 days. As such, a continuance is required and requested.

## **II. LEGAL ANALYSIS**

Pursuant to NRAP 26(b)(1)(B) this Court may extend the time after a 14 day extension upon a showing of extraordinary circumstances. Here, Appellants transcripts, which are necessary to this appeal, were delivered on August 24, 2021, a mere two (2) days prior to the due date for the opening brief. Additionally, this Court ordered Respondent to find counsel to assist her in this complicated case but has not done so yet. As such, extraordinary circumstances exist to extend time to file the opening brief and appendix.

## **III. CONCLUSION**

For the foregoing reasons, undersigned requests until no later than September 10, 2021 (or whatever time this Court deems appropriate) to file the opening brief and appendix in this matter

DATED this 26<sup>th</sup> day of August, 2021.

*/s/ Michancy Cramer*

MICHANCY CRAMER, Nevada Bar No. 11545

**ALEX B. GHIBAUDO, PC**

*Attorney for Appellant*



**Certificate of Service**

Pursuant to NRAP 25, on August 26, 2021 APPELLANT’S MOTION TO  
EXTEND TIME was served upon each of the parties to appeal 82248 via electronic  
service through the Supreme Court of Nevada’s electronic filing system and through  
the regular mail to:

Tara Kellogg  
2050 West Warm Springs Road, #2112  
Henderson, Nevada 89014

*/s/ Michancy Cramer*

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An Employee of Alex B. Ghibaud, PC







# EXHIBIT 3