

1                                   **THE STATE OF NEVADA COURT OF APPEALS**

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4       **NECHOLE GARCIA,**  
5                                   Appellant,

6                                   vs.

7       **EVGENY SHAPIRO,**  
8                                   Respondent.

Electronically Filed  
Feb 21 2022 10:03 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

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10                                   Case No.: **83992-COA**

11                                   **APPELLANT’S MOTION FOR EXPANDED FAST TRACK**  
12                                   **STATEMENT**

13                                   Appellant, NECHOLE GARCIA respectfully moves this Honorable Court  
14 for an order allowing the Appellant an expanded Fast Track Statement, pursuant  
15 to NRAP 3E(d), allowing the Statement to exceed the sixteen (16) page limit. This  
16 request is made in good faith, and not for purposes of delay. Appellant requests  
17 five (5) additional pages, equaling twenty-one (21) pages total.  
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20                                   The pleading that gave rise to the district court trial and ultimately the  
21 underlying appeal was Respondent’s Motion for Custody, Child Support, and  
22 Other Related Relief. Since Respondent’s Motion was filed on August 7, 2020,  
23 the parties have engaged in extensive and contentious litigation.  
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25                                   Appellant filed her Notice of Appeal on December 29, 2021, which was  
26 both timely and proper. Appellant filed her Case Appeal Statement on December  
27 31, 2021. Appellant’s Fast Track Statement is due on March 7, 2022.  
28

1        This matter has a lengthy and complex history, which is specifically  
2 relevant to the issues on appeal, and background facts are necessary and crucial  
3 to give the Court a complete picture for this appeal. Namely, there were two (2)  
4 full days of trial. In addition, the district court also held a hearing between the first  
5 and second day of trial, where it gave instructions pertaining to the evidence  
6 presented at trial. There were several experts who testified and prepared reports  
7 that were admitted as evidence. There was also a court appointed custody  
8 evaluator appointed early on in the case, whose lengthy report was admitted as  
9 evidence at trial. Additionally, each side had an expert witness testify at trial about  
10 the child's needs and appropriate parenting plan. Both expert witnesses prepared  
11 reports that were admitted as evidence during trial. Finally, several of the child's  
12 treating professionals also testified and provided reports regarding the child's  
13 development and needs, which were also admitted as evidence. The facts and  
14 evidence presented from the multiple days of testimony and expert reports must  
15 all be discussed by Appellant, in order to adequately address all the issues raised  
16 in her appeal.  
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23        Appellant moves this Court to expand the page-volume limitation of her  
24 Fast Track Statement pursuant to NRAP 3E(d) to exceed the sixteen (16) page  
25 limit. Due to the complexity and intricate details of this case, it is impossible to  
26 meet the sixteen (16) page limit for the Fast Track Statement.  
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1 For the aforementioned reasons, Appellant respectfully requests that she be  
2 allowed to submit an expanded Fast Track Statement equaling twenty-one (21)  
3 pages total.  
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5 This motion is being submitted in good faith, and without the intent to cause  
6 undue delay in the underlying appeal.  
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8 Dated this 21<sup>st</sup> day of February 2022.  
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10 Submitted by:  
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12   
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