

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

NECHOLE GARCIA,

Appellant,

EVGENY SHAPIRO,

Respondent.

Electronically Filed  
Apr 25 2022 09:35 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court  
Case No.: 83992-COA

**RESPONDENT'S MOTION FOR PERMISSION TO ENLARGE THE TYPE-VOLUME  
LIMITATION ON FAST TRACK RESPONSE**

COMES NOW, Respondent, EVGENY SHAPIRO, by and through his unbundled attorney of record, JENIFFER ISSO, ESQ. of the ISSO & HUGHES LAW FIRM, and hereby requests an Order granting Respondent's request to enlarge the type-volume limitation on his Fast Track Response to 12,000 words. This Motion is based upon the Memorandum of Points and Authorities and all other papers and pleadings on file herein.

DATED this 25<sup>th</sup> day of April, 2022.

**ISSO & HUGHES LAW FIRM, LLC**

Respectfully submitted:

/s/ Jennifer Isso, Esq.

JENNIFER ISSO, ESQ.

Nevada Bar No. 13157

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*Attorney for Respondent*

## **MEMORANDUM OF POINTS AND AUTHORITIES**

NRAP 32(a)(7)(d) states that A party may seek leave of the court to expand the length of the fast track statement or response. See also NRAP 3(E)3. The requesting party must demonstrate that the complexity of the case and the issues presented warrant granting the request. A request for expansion must be filed at least 14 days before the fast track statement or response is otherwise due, and must specify the number of additional pages requested.

The Appellant filed a motion on March 4, 2022, asking to enlarge limitation on her Fast Track Statement to 12,000 words. The Court has granted this motion. The Appellant then submitted a Fast Track Brief that has 10,811 words.

In order to provide a comprehensive response to the Appellant's Fast Track brief, the Respondent is similarly asking to enlarge the limitation on his Fast Track response to 12,000 words. This is needed to diligently address all the statements, allegations and issues raised by the Appellant.

Therefore, Respondent respectfully requests this Court to find good cause and allow Respondent to submit a response up to a limit of 12,000 words.

DATED this 25<sup>th</sup> day of April, 2022.

**ISSO & HUGHES LAW FIRM, LLC**

Respectfully submitted:

/s/ Jennifer Isso, Esq.

JENNIFER ISSO, ESQ.

Nevada Bar No. 13157

[ji@issohugheslaw.com](mailto:ji@issohugheslaw.com)

*Attorney for Respondent*

**Certificate of Service**

I, the undersigned, do hereby certify that on the 25th day of April 2022, a true and correct copy of the foregoing Motion was Emailed to:

EMILY MCFARLING, ESQ.  
emilym@mcfarlinglaw.com  
Attorney for Appellant

/s/ Jennifer Isso  
An employee of  
ISSO & HUGHES