



1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 This Motion is made pursuant to NRAP 26(b)(A) and NRAP 31 which state in  
3 pertinent part:

4 (b) The court for good cause shown may upon motion enlarge  
5 the time prescribed by these rules or by its order for doing an  
6 act, or may permit an act to be done after the expiration of such  
7 time; but the court may not enlarge the time for filing a notice of  
8 appeal...

9 (d) Except as otherwise provided in these rules, or when not  
10 otherwise controlled by statute, the time provided in any of  
11 these rules within which an act shall be done, may be extended  
12 or shortened by stipulation of the parties, or by order of the  
13 court or a justice thereof upon good cause shown. No  
14 stipulation extending time shall be effective unless approved  
15 by the court or a justice thereof...

16 The relief requested by Appellant is to enlarge the time for filing a Docketing  
17 Statement in the above captioned appeal. This is Appellant's first written request.

18 **A. GOOD CAUSE IS SHOWN TO ENLARGE TIME**

19 As stated above, Appellant's counsel recently and unexpectedly lost a key  
20 employee in the office when her family law paralegal fell ill to illness, in addition to  
21 a substantial trial schedule.

22 Moreover, Respondent will not be prejudiced by an enlargement of time and  
23 the trial transcripts have already been ordered and received on November 3, 2021.  
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1 Accordingly, counsel for Appellant respectfully requests a brief extension of time in  
2 which to file Appellant's Docketing Statement.

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4 **CONCLUSION**

5 For the above and foregoing reasons, Appellant respectfully requests that the  
6 Court grant her Request for extension of time to file a Docketing Statement.  
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8 DATED this 8<sup>th</sup> day of November, 2021.  
9

10 PATRICIA A. MARR, LLC

11 /s/Patricia A. Marr, Esq.

12  
13 Patricia A. Marr, Esq.  
14 Nevada Bar No. 008846  
15 2470 St. Rose Parkway, Ste. 110  
16 Henderson, Nevada 89074  
17 (702) 353-4225 (telephone)  
18 (702) 912-0088 (facsimile)  
19 patricia@marrlawlv.com  
20 *Attorney for Appellant*

21  
22 **DECLARATION OF PATRICIA A. MARR, ESQ. IN SUPPORT OF**  
23 **MOTION**

24 PATRICIA A. MARR, ESQ., being first duly sworn under the penalties of  
25 perjury

26 makes the following Declaration and deposes and says:

- 27 1. That I am counsel for the Appellant in the above-referenced action;  
28 2. That I have read the foregoing *Motion* and know the contents thereof; that

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the same is true of my own knowledge, except as to those matters therein contained stated upon information and belief, and as to those matters, I believe them to be true.

WHEREFORE, it is respectfully requested that this Honorable Court grant Appellant's *Motion* in its entirety.

**I declare under penalty of perjury under the laws of the State of Nevada (NRS 53.045 and 28 U.S.C. §1746), that the foregoing is true and correct.**

Dated this 8<sup>th</sup> day of November, 2021.

/s/Patricia A. Marr, Esq.

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PATRICIA A. MARR, ESQ.

1 **CERTIFICATE OF SERVICE**

2  
3 Pursuant to NRCP 5(b), I certify that I am an employee of Patricia A. Marr,  
4 Ltd., and that on this date, November 9, 2021, I served the foregoing *Motion* on all  
5 parties to this action by placing an original or true copy thereof in a sealed enveloped  
6 place for collection and mailing in the United States Mail, at Las Vegas, Nevada,  
7 postage paid, following the ordinary business practices and/or via facsimile/E-  
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9  
10 Service to:

11 Caleb Haskin  
12 340 N. 16<sup>th</sup> Lane  
13 Philomath, Oregon 97370

14  
15 M. Nelson Segel, Esq.  
16 Nevada Supreme Court Settlement Judge  
17 6440 Sky Pointe Dr., Ste. 140-238  
18 Las Vegas, Nevada 89131

19  
20 /s/Patricia A. Marr, Esq.

21 \_\_\_\_\_  
22 An employee of Patricia A. Marr, LLC  
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