IN THE SUPREME COURT OF THE STATE OF NEVADA

LISA MYERS,)	Electronically Filed Dec 07 2021 10:07 a.m Elizabeth A. Brown Case No.: 8357©lerk of Supreme Court
)	
Appellant,)	
v.)	
)	
CALEB HASKINS,)	
)	
Respondent.)	
)	

MOTION FOR EXTENSION OF TIME TO FILE FAST TRACK STATEMENT APPENDICES

COMES NOW, the Appellant, by and through her counsel of record and respectfully moves this Court for an extension of time in which to file her Fast Track Statement and Appendices.

On November 3, 2021, counsel received the trial transcripts.

On December 6, 2021, *prior to midnight*, counsel began the filing for the Fast Track Statement and Appendices, however, the filing was not deemed completed until 12:02 a.m.

Notably, counsel has had a substantial trial schedule as a consequence of a backlog of trials from the pandemic, as well as had to deal with the illness of employees who had to quarantine when sick to protect others in the office. Based upon the same, counsel was literally, "burning the midnight oil," however, completed the Fast Track Statement and Appendices prior to midnight and filed the same prior

to midnight. However, the brief electronic lag time between the submission of the Fast Track Statement and Appendices and the actual acceptance of the same, cause the same to be two (2) minutes late.

Accordingly, Appellant respectfully requests a brief extension of time to file the same, specifically, that the Fast Track Statement and Appendices be permitted to be filed the day of the adjudication of the instant Motion.

MEMORANDUM OF POINTS AND AUTHORITIES

This Motion is made pursuant to NRAP 3F(3) which state in part that a request for extension of time may be made based upon extreme need or merit. In that regard, counsel submits that the Fast Track Statement and Appendices were finalized and the filing of the same began before midnight on December 6, 2021, however, again, the brief lag time between the submission and the actual filing time caused the documents to be two (2) minutes late.

This is Appellant's first written request and Respondent will not be prejudiced by the request because he currently has primary physical custody of the child.

CONCLUSION

For the above and foregoing reasons, Appellant respectfully requests that the Court grant her Request for extension of time to file the Fast Track Statement and

Appendices as of the date of the adjudication of this Motion.

DATED this 7th day of December, 2021.

PATRICIA A. MARR, LLC

/s/Patricia A. Marr, Esq.

Patricia A. Marr, Esq. Nevada Bar No. 008846 2470 St. Rose Parkway, Ste. 110 Henderson, Nevada 89074 (702) 353-4225 (telephone) (702) 912-0088 (facsimile) patricia@marrlawlv.com Attorney for Appellant

<u>DECLARATION OF PATRICIA A. MARR, ESQ. IN SUPPORT OF MOTION</u>

PATRICIA A. MARR, ESQ., being first duly sworn under the penalties of perjury makes the following Declaration and deposes and says:

- 1. That I am counsel for the Appellant in the above-referenced action;
- 2. That I have read the foregoing *Motion* and know the contents thereof; that 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 7th day of December, 2021. /s/Patricia A. Marr, Esq. PATRICIA A. MARR, ESQ.

CERTIFICATE OF SERVICE

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3	Pursuant to NRCP 5(b), I certify that I am an employee of Patricia A. Marr,		
4	Ltd., and that on this date, December 7, 2021, I served the foregoing <i>Motion</i> on all		
5			
6	parties to this action by placing an original or true copy thereof in a sealed enveloped		
7	place for collection and mailing in the United States Mail, at Las Vegas, Nevada,		
8			
9	postage paid, following the ordinary business practices and/or via facsimile/E-		
10	Service to:		
11			
12	Caleb Haskin		
13	340 N. 16 th Lane Philomath, Oregon 97370		
14			
15	M. Nelson Segel, Esq.		
16	Nevada Supreme Court Settlement Judge		
	6440 Sky Pointe Dr., Ste. 140-238		
17	Las Vegas, Nevada 89131		
18			
19			
20	/s/Patricia A. Marr, Esq.		
21	An employee of Patricia A. Marr, LLC		
22	I'm empreyee of function in than, BBC		
23			
24			
25			
26			