

1 to midnight. However, the brief electronic lag time between the submission of the
2 Fast Track Statement and Appendices and the actual acceptance of the same, cause
3 the same to be two (2) minutes late.
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5 Accordingly, Appellant respectfully requests a brief extension of time to file the
6 same, specifically, that the Fast Track Statement and Appendices be permitted to be
7 filed the day of the adjudication of the instant Motion.
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10 **MEMORANDUM OF POINTS AND AUTHORITIES**

11 This Motion is made pursuant to NRAP 3F(3) which state in part that a request
12 for extension of time may be made based upon extreme need or merit. In that regard,
13 counsel submits that the Fast Track Statement and Appendices were finalized and the
14 filing of the same began before midnight on December 6, 2021, however, again, the
15 brief lag time between the submission and the actual filing time caused the
16 documents to be two (2) minutes late.
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19 This is Appellant's first written request and Respondent will not be prejudiced
20 by the request because he currently has primary physical custody of the child.
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23 **CONCLUSION**

24 For the above and foregoing reasons, Appellant respectfully requests that the
25 Court grant her Request for extension of time to file the Fast Track Statement and
26
27
28

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

2 DATED this 7th day of December, 2021.

3
4 PATRICIA A. MARR, LLC

5 /s/Patricia A. Marr, Esq.

6
7 Patricia A. Marr, Esq.
8 Nevada Bar No. 008846
9 2470 St. Rose Parkway, Ste. 110
10 Henderson, Nevada 89074
11 (702) 353-4225 (telephone)
12 (702) 912-0088 (facsimile)
13 patricia@marrlawlv.com
14 *Attorney for Appellant*

15
16 **DECLARATION OF PATRICIA A. MARR, ESQ. IN SUPPORT OF**
17 **MOTION**

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

- 20 1. That I am counsel for the Appellant in the above-referenced action;
21 2. That I have read the foregoing *Motion* and know the contents thereof; that
22 the same is true of my own knowledge, except as to those matters therein
23 contained stated upon information and belief, and as to those matters, I
24 believe them to be true.
25

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

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, December 7, 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-
8

9
10 Service to:

11 Caleb Haskin
12 340 N. 16th 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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