

IN THE SUPREME COURT OF THE STATE OF NEVADA

William Shawn Wallace,

Appellant,

vs.

Ammie Ann Wallace,

Respondent.

Electronically Filed
Nov 30 2021 12:29 p.m.
Supreme Court Case No. 83591
Elizabeth A. Brown
District Court Case No. 19-20
Clerk of Supreme Court
613567-Z

**MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S FAST
TRACK STATEMENT AND JOINT APPENDIX**

COMES NOW Appellant, **William Shawn Wallace**, by and through his attorneys of record, **Bruce I. Shapiro, Esq.** and **Shann D. Winesett, Esq.**, of PECOS LAW GROUP, and respectfully request that this court grant his Motion for Extension of Time to File his Fast Track Statement and Joint Appendix.

...

...

...

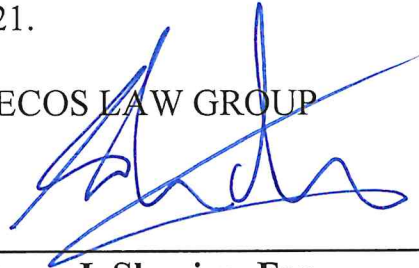
...

...

This motion is made and based on the papers and pleadings on file herein and the points and authorities submitted herewith, and is made in good faith and not to delay justice.

DATED this 30th day of November, 2021.

PECOS LAW GROUP



Bruce I. Shapiro, Esq.

Nevada Bar No. 004050

Shann D. Winesett, Esq.

Nevada Bar No. 005551

PECOS LAW GROUP

8925 South Pecos Road, Suite 14A

Henderson, Nevada 89074

(702) 388-1851

Attorneys for Appellant

MEMORANDUM OF POINTS AND AUTHORITIES

Nevada Rule of Appellate Procedure, Rule 26(b)(1)(A) states:

For good cause, the court may extend the time prescribed by these Rules, or by its order to perform any act, or may permit an act to be done after that time expires. But the court may not extend the time to file a notice of appeal except as provided in Rule 4(c).

Appellant's Fast Track Statement and Joint Appendix was due on November 29, 2021. Because the undersigned counsel did not represent Appellant in the lower court, counsel will require sufficient time to review the

record and prepare Appellant's Fast Track Statement and Joint Appendix. Appellant, therefore, respectfully request a 30 day extension up to and including December 29, 2021 to file his Fast Track Statement and Joint Appendix. This is the first continuance that would be granted to Appellant, and no party will suffer prejudice from the granting of this motion.

Counsel recognizes that this motion is filed a day after the deadline for filing the Fast Track Statement. Counsel discovered that the due date had been mis-calendared when counsel requested a telephonic continuance and was advised that a motion would need to be filed. Counsel respectfully requests the court's indulgence regarding this calendaring error.

DATED this 30th day of November, 2021.

PECOS LAW GROUP



Bruce I. Shapiro, Esq.

Nevada Bar No. 004050

Shann D. Winesett, Esq.

Nevada Bar No. 005551

PECOS LAW GROUP

8925 South Pecos Road, Suite 14A

Henderson, Nevada 89074

(702) 388-1851

Attorneys for Appellant

AFFIDAVIT OF SHANN D. WINESETT, ESQ.

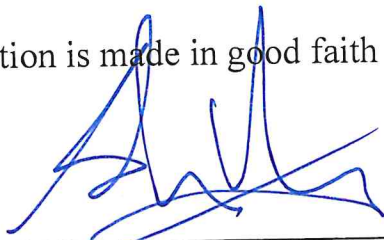
STATE OF NEVADA)

: ss.

COUNTY OF CLARK)

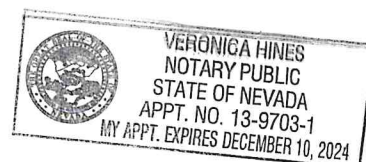
SHANN D. WINESETT, ESQ., first being duly sworn, deposes and says:

1. He is an attorney licensed to practice in the State of Nevada and attorney for Appellant in the above-referenced action; that by virtue of that fact, he has personal knowledge of the matters contained herein and is competent to testify to the same;
2. Affiant makes this affidavit in support of the foregoing "Motion for Extension of Time to File Appellant's Fast Track Statement and Joint Appendix;"
3. Affiant has read the foregoing Motion and hereby certifies that the facts set forth in the Points and Authorities attached thereto are true according to the record herein, and Affiant believes them to be true. Affiant incorporates these facts into this Affidavit as though fully set forth herein;
4. Affiant further attests that this motion is made in good faith and not to delay justice.


SHANN D. WINESETT, ESQ

SUBSCRIBED and SWORN to before
me this 30th day of November, 2021.


NOTARY PUBLIC



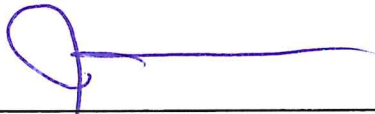
CERTIFICATE OF MAILING

I hereby certify that the foregoing “Moton for Extension of Time to File Appellant’s Fast Track Statement and Joint Appendix” in the above-captioned matter was served this date by mailing a true and correct copy via first class mail, postage prepaid and addressed as follows:

Shelly Booth Cooley, Esq.
THE COOLEY LAW FIRM
10161 Park Run Dr., #150
Las Vegas, Nevada 89145

Racheal H. Mastel, Esq.
KAINEN LAW GROUP
3303 Novat Street, Suite 200
Las Vegas, Nevada 89129

DATED this 30th day of November 2021.



Janine Shapiro
an Employee of Pecos Law Group