

IN THE COURT OF APPEALS OF THE STATE OF NEVADA

* * *

ADAM MICHAEL SOLINGER,

Appellant,

vs.

CHALESE MARIE SOLINGER,

Respondent.

Case No.: 84832-COA

Electronically Filed
Oct 12 2022 09:49 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

**MOTION FOR AN EXTENSION OF TIME
TO FILE FAST TRACK STATEMENT**

COMES NOW Appellant, ADAM MICHAEL SOLINGER, by and through attorney of record, Vincent Mayo, Esq. of The Abrams & Mayo Law Firm, and hereby files his *Motion for an Extension of Time to File Fast Track Statement*.

Adam's *Fast-Track Statement* is currently due, following a 7-day telephonic extension granted by this Court, on October 18, 2022. The extension was necessitated by the fact Adam had not yet received the requested rough draft transcript in the case. Adam timely filed his *Request for Rough Draft Transcript* with the district court on September 8, 2022, and concurrently initiated the process to order the transcripts from the Eighth Judicial District Court, who contracts with Verbatim Reporting & Transcription to prepare the transcripts. After receiving the estimate and paying the required deposit below, Adam filed his *Request for Rough Draft Transcript of Proceedings* with this Court on October 4, 2022. Pursuant to NRAP 3E(c)(2)(C), Verbatim has 21 days from the date of the request to file the original rough draft transcripts with the district court, plus an additional seven days to provide notice to

the Clerk of this Court stating that the transcripts have been filed. Based on this timeframe, the Clerk of this Court is tracking the notice to be due on November 2, 2022.

Commencing on September 28, 2022, Adam diligently reached out to Verbatim several times respectfully seeking an update on the status of the rough draft transcript. On October 11, 2022, Verbatim stated to the undersigned's office that they "are doing [their] best to have all of the transcripts completed by the end of the month (on or before 10/31)."¹ This is well beyond the 21-day time frame cited above from when the original request was made on September 8th. In either event, the transcripts will not be completed by the October 18th due date of Adam's *Fast-Track Statement*.

The delay in the completion of the transcripts makes the review of the multi-day trial record (with trial in this case having taken place over five days) and incorporation of the numerous citations into and completion of the *Fast-Track Statement* prohibitively impossible by October 18th. Thus, there is an extreme need for additional time to finalize and file the *Fast-Track Statement*. Accordingly, Adam respectfully requests that, pursuant to NRAP 3E(f)(3), this Court extend the time for him to file his *Fast-Track Statement* to November 16, 2022.² In light of the fact that Verbatim represents that the *earliest* they will have the transcripts completed and provided will be October 31, 2022, and Adam will need sufficient time to review and

¹ See email communication with Verbatim, attached hereto as **Exhibit 1**.

² This date is calculated based on 14 days following the notice due to this Court by Verbatim. Should Verbatim request additional time to prepare the transcript, additional time to file the *Fast-Track Statement* may be requested.

incorporate said transcript into the *Fast Track Statement* in order for Adam to effectively advance his position to this Honorable Court, an extension to November 16, 2022 is reasonable and meritorious.

DATED Wednesday, October 12, 2022.

Respectfully Submitted:

THE ABRAMS & MAYO LAW FIRM

/s/ Vincent Mayo, Esq._____

Vincent Mayo, Esq.

Nevada State Bar Number: 8564

6252 South Rainbow Blvd., Suite 100

Las Vegas, Nevada 89118

Attorney for Appellant

CERTIFICATE OF SERVICE

I hereby certify that the foregoing *Motion for an Extension of Time to File Fast-Track Statement* was filed electronically with the Clerk of the Court of Appeals of Nevada in the above-entitled matters on Wednesday, October 12, 2022. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Alex Ghibaud, Esq.
Michancy Cramer, Esq.
Attorneys for Respondent

/s/ David J. Schoen, IV, ACP
An employee of The Abrams & Mayo Law Firm

EXHIBIT 1

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David Schoen

Subject: RE: D-19-582245-D - Solinger

From: Michael Pace <michael@verbatimrt.com>

Sent: Tuesday, October 11, 2022 9:25 AM

To: David Schoen <dschoen@tamlf.com>

Cc: 'Austin Shaw' <austin@verbatimrt.com>; kimberly@verbatimrt.com; karla@verbatimrt.com

Subject: RE: D-19-582245-D - Solinger

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Mr. Schoen,

We are doing our best to have all of the transcripts completed by the end of the month (on or before 10/31). I will also check with our production staff about releasing the transcripts as they are completed, so you can begin working with them as soon as possible.

If you have any other questions, please let us know.

Sincerely,

Michael Pace

Intake Coordinator

Verbatim Reporting & Transcription

michael@verbatimrt.com

(281) 724-8600 | (520) 303-7356

<http://www.verbatimrt.com>



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From: David Schoen <dschoen@tamlf.com>

Sent: Tuesday, October 11, 2022 11:11

To: Austin Shaw <austin@verbatimrt.com>

Cc: Michael Pace <michael@verbatimrt.com>

Subject: Re: D-19-582245-D - Solinger

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Thank you! Do you have a rough estimate for turnaround?

Very respectfully,

David J. Schoen, IV, ACP
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