

IN THE COURT OF APPEALS OF THE STATE OF NEVADA

* * *

ADAM MICHAEL SOLINGER,)	Case No.:	84832-COA
)		
Appellant,)		Electronically Filed
)		Oct 04 2022 11:09 p.m.
vs.)		Elizabeth A. Brown
)		Clerk of Supreme Court
CHALESE MARIE SOLINGER,)		
)		
Respondent.)		
)		

APPELLANT’S MOTION FOR LEAVE TO FILE EXPANDED CHILD CUSTODY FAST TRACK STATEMENT PURSUANT TO NRAP 3E(d)(4)

Appellant, ADAM MICHAEL SOLINGER, by and through his attorney, Vincent Mayo, Esq., of The Abrams & Mayo Law Firm, respectfully moves this Court for permission, pursuant to NRCP 3E(d)(4), to file his *Child Custody Fast Track Statement* in excess of the page-volume limitations set forth in NRAP 3E(d)(1) and the type-volume limitations set forth in NRAP 3E(e)(2), based upon the below Points and Authorities.

POINTS AND AUTHORITIES

NRAP 3E(d)(1) mandates that a fast track statement should not exceed 16- pages in child custody appellate matters. However, pursuant to NRAP 3E(e)(2), “[t]he size of a fast track filing may be calculated by type-volume in lieu of page limitation. Using a type-volume limitation, a fast track statement is acceptable if it contains no more than 7,267 words or 693 lines of text.” NRAP 3E(d)(2) permits a party to seek leave to file a brief beyond these limitations, if they “demonstrate that

the complexity of the case and the issues presented warrant granting the request.” The request must also be filed at least 14 days before the fast track statement is due, and must specify the number of additional pages requested. The fast track statement is currently due on October 18, 2022. This motion is timely.

Adam’s pending appeal involves a very lengthy procedural history of nearly four years of extensive litigation, culminating in a 5-day evidentiary hearing which adjudicated both the issues in the parties’ divorce, as well as child custody matters. While the appeal does concern child custody orders and is appropriately in the fast track program, there are also significant issues concerning the division of assets and debts, awards of attorney’s fees, and the manner in which the district court conducted the trial. Based on these issues, the undersigned cannot adequately prosecute this appeal within the aforementioned page- and type-volume limitations.

Accordingly, Adam respectfully requests the Court either allow, accept, and file his *Child Custody Fast Track Statement* at either a page-volume limitation of 30 pages or a type-volume limitation of 14,000 words.

DATED Tuesday, October 04, 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 *Appellant's Motion for Leave to File Expanded Child Custody Fast Track Statement Pursuant to NRAP 3E(d)(2)* was filed electronically with the Clerk of the Nevada Supreme Court in the above-entitled matters on Tuesday, October 4, 2022. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

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

/s/ David J. Schoen, IV, ACP

An employee of The Abrams & Mayo Law Firm