



Alex B. Ghibaudo, Esq.
Nevada Bar No. 10592
ALEX GHIBAUDO, PC
197 E California Ave, Ste 250
Las Vegas, Nevada 89104
T: (702) 462-5888
F: (702) 924-6553
E: alex@glawvegas.com
Attorney for Respondent

Electronically Filed
Dec 20 2022 11:24 PM
Elizabeth A. Brown
Clerk of Supreme Court

IN THE SUPREME COURT FOR THE STATE OF NEVADA

ADAM SOLINGER,

Appellant,

vs.

CHALESE SOLINGER,

Respondent.

Docket Number: 84832-COA

**RESPONDENT'S FIRST MOTION
TO EXTEND TIME TO FILE FAST
TRACK RESPONSE**

COMES NOW Respondent, Chalese Solinger, through her attorney, Alex Ghibaudo, Esq. of the law firm of Alex B. Ghibaudo, PC and files the following motion:

MEMORANDUM OF POINTS AND AUTHORITIES

Appellant has submitted an extensive appendix of exhibits consisting of 4,791 pages spread over 22 volumes. The case spans at just under four (4) years of litigation. To put it generously, the record is extensive. This case was assigned to undersigned counsel's former associate attorney, Michancy Cramer, Esq., who left the firm on December 5, 2022 to work for an insurance defense firm. Though Ms. Cramer left extensive notes on the case, they are, by themselves, extensive.

Undersigned counsel has absorbed Ms. Cramer's previously assigned case load into his own already extensive inventory of cases.

As such, it has become impossible to complete the fast track response in the time permitted since the filing of the fast track statement and its voluminous exhibits. Undersigned Counsel did request a telephonic extension but even then he had 29 days to complete the response due today while at the same time absorbing, reviewing, and getting up to speed with the cases previously assigned to Ms. Cramer. Undersigned counsel therefore asks for an extension to respond to this brief to January 6, 2023, in light of the intervening holidays and the amount of work required to review documents presented and respond to the Appellant's fast track statement.

LEGAL ANALYSIS

Under NRAP 3E(f)(3) this Court may extend the time to file a fast track statement/response if there is merit to the request. Here, the extent of the record and the shortened period of time provided made it extraordinarily difficult to review the entirety of the record compiled by Appellant and prepare the fast track response without rushing the matter to the detriment of Respondent. The time constraint was exacerbated by undersigned counsel's former associate, who was assigned this matter at the district court, leaving the firm on December 5, 2022. Furthermore, the intervening holidays, and the time taken by staff for those holidays, has further constrained the time undersigned counsel had to respond to the fast track statement.

CONCLUSION

For the foregoing reasons, and pursuant to the Rule cited above, there is merit to Respondent's request. Therefore, Respondent requests permission to file the necessary fast track response no later than January 6th, 2023.

Respectfully submitted this 20th day of December, 2022.

//s// Alex Ghibaud

Alex Ghibaud, Esq., Nevada Bar No. 10592
ALEX B. GHIBAUDO, PC

CERTIFICATE OF MAILING

Pursuant to NRAP 25(c)(1) and NEFCR 9, I certify that on the 20th day of December, 2022, that I caused to be served the foregoing MOTION TO EXTEND TIME TO FILE A FAST TRACK RESPONSE through the Nevada Supreme Court's electronic filing system to the following:

Vincent Mayo, Esq.
Nevada State Bar Number: 8564
The Abrams & Mayo Law Firm
6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
Tel: (702) 222-4021

Dated this 20th Day of December, 2022.

/s/ Alex Ghibaudo, Esq.

Alex B. Ghibaudo, PC