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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 THIRD MOTION
TO EXTEND TIME TO FILE FAST
TRACK RESPONSE AND FOR
PERMISSION TO EXTEND THE
PAGE AND WORD COUNT LIMIT
IN NRAP 3E(e)(2)**

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

On January 9, 2023 Chalese, through counsel, filed her second motion to extend time to file a fast track response requesting an additional four (4) days to file her response (January 13, 2023), which was specifically requested by counsel. Counsel for Chalese now request a third and final extension of time to January 16, 2023, an additional three (3) days to complete the response and file it.

Counsel has now completed his review of the extensive record and begun the process of writing and editing the response. Counsel needs additional time to do so. Counsel has worked diligently and as quickly as possible while maintaining a heavy case load cognizant of the fact that there is much at stake in this matter. However, again, the extent of the record and the length and breadth of the appellant's fast track statement has presented a challenge.

Regarding the length and breadth of the fast track statement, counsel further requests, in an abundance of caution, an extension of the page and word count limitations contained in NRAP 3E(e)(2). Specifically, Counsel requests, in addition to an extension of time, that the fast track response be at least 22 pages or 9,240 words (2/3 the 14,000 word count allowed the appellant by this court, which is in line with NRAP 3E(e)(2)) in order to adequately provide the space necessary to address the scope and breadth of 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, counsel continues to work diligently to complete the fast track response cognizant of the importance of expediting this litigation for the parties' sake and given what is at stake. Unfortunately, counsel continues to struggle to meet those deadlines given the length and breadth of the fast track statement and appendix. That being said, counsel has reviewed the record in its entirety and has begun to write the fast track response. Given the undertaking, however, counsel requests one last extension of

time to complete that response and is confident he can meet that deadline given the holiday weekend will provide uninterrupted time to work on the response and complete it.

CONCLUSION

For the foregoing reasons, and pursuant to the Rule cited above, there is merit to Respondent's counsel's request. Therefore, undersigned requests permission to file the necessary fast track response no later than January 16th, 2023 and that this Court expand the page and word count to 22 pages or 9,240 words to give adequate space to fully respond to the appellant's fast track statement.

Respectfully submitted this 13th day of January, 2023.

//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 13th day of January, 2023, that I caused to be served the foregoing RESPONDENT’S THIRD 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 13th Day of January, 2023.

/s/ Alex Ghibaudo, Esq.

Alex B. Ghibaudo, PC