## IN THE COURT OF APPEALS OF THE STATE OF NEVADA

ADAM MICHAEL SOLINGER,	)	Case No.:	84832-COA
Appellant,	)		
VS.	)		Jan 30 2023 03:57 PM Elizabeth A. Brown
CHALESE MARIE SOLINGER,	)		Clerk of Supreme Cour
Respondent.	)		
	)		

## APPELLANT'S MOTION FOR LEAVE TO FILE EXPANDED CHILD CUSTODY REPLY TO FAST-TRACK RESPONSE PURSUANT TO NRAP 3E(d)(4), AND MOTION FOR AN EXTENSION OF TIME TO FILE REPLY TO FAST-TRACK RESPONSE

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 Leave to File Expanded Child Custody Reply to Fast-Track Response Pursuant to NRAP 3E(d)(4), and Motion for an Extension of Time to File Reply to Fast-Track Response*.

Adam's *Reply to Fast-Track Response* is currently due on January 30, 2022. Though this is docketed as part of the child custody fast-track program, this appeal encompasses more than just child custody matters and is the result of a multi-day trial and numerous related hearings. The record below is voluminous with the appendix in this appeal consisting of 22 volumes (not including the hundreds of trial exhibits admitted below). As such, the 14-day timeline in which to file a *Reply to Fast-Track Response* and the 5-page limit set forth in pursuant to NRAP 3E(d)(3) are inadequate to properly present Adam's case to this Court, especially as to the additional financial

issues. This Court has already acknowledged the complexity of this matter, having previously granted Adam's motions for an extension of time and to increase the page-volume limitation to 30 pages / type-volume limitation to 14,000 words for Adam's

Child Custody Fast-Track Statement, in addition to Chalese's numerous motions for

an extension of time.

words.

Based on the foregoing, Adam respectfully requests that, pursuant to NRAP 3E(f)(3), this Court grant this first request to extend the time by 14 days for him to file his *Reply to Fast-Track Response* to February 13, 2023. Additionally, pursuant to NRAP 3E(d)(4), that this Court allow Adam to file his *Reply to Fast-Track Response* at either a page-volume limitation of 15 pages or a type-volume limitation of 7,000

DATED Monday, January 30, 2023.

Respectfully Submitted:

THE ABRAMS & MAYO LAW FIRM

<u>/s/ Vincent Mayo, Esq.</u>\_

Vincent Mayo, Esq.

Nevada State Bar Number: 8564

6252 South Rainbow Blvd., Suite 100

Las Vegas, Nevada 89118 Attorney for Appellant

2

## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Appellant's Motion for Leave to File Expanded Child Custody Reply to Fast-Track Response Pursuant to NRAP 3E(d)(4), and Motion for an Extension of Time to File Reply to Fast-Track Response was filed electronically with the Clerk of the Court of Appeals of Nevada in the above-entitled matters on Monday, January 30, 2023. 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