

FILED

APR 21 2023

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
BY *[Signature]*
DEPUTY CLERK

IN THE COURT OF APPEALS OF THE STATE OF NEVADA

KYMBERLIE JOY HURD,

Appellant,

vs.

MARIO OPIPARI,

Respondent.

Supreme Court No.: 85537-COA

District Court No.: D622669

**MOTION REQUESTING LEAVE
TO FILE EXPANDED MOTION
FOR STAY (CHILD CUSTODY) OF
DISTRICT COURT ORDERS**

Appellant ("Kymberlie") respectfully requests this Honorable Court to grant leave to file an expanded motion for stay. NRAP 32(a)(7)(D). Appellant is unable to present all of the statement of facts, arguments, and legal authorities that are necessary to understand the material issues, and violations of law and rights as they encompass over seventeen (17) months of procedural history and a gross amount of violations.

Kymberlie seeks a stay of the district court proceedings pending appeal. The Order(s) to be stayed are the Findings of Fact, Conclusions of Law and Order From The Evidentiary Hearing filed, October 17, 2022 and all prior interlocutory filed orders that were not independently appealable (1/11/2022,

APR 21 2023
5/19/2022 & 5/26/2022).

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
DEPUTY CLERK

23-12571

1 The Motion For Stay of District Court Orders has been diligently reviewed
2 by Kymberlie to reduce the page number in good faith. This motion already omits
3 an extensive amount of facts and legal arguments and was reduced to focus on
4 what Kymberlie feels is the most pertinent issues only as they relate to the best
5 interests of the minor child.
6

7 Kymberlie bates stamped all exhibits for convenience and efficiency and has
8 referenced the exact page number(s) within the record she provides in her motion
9 for stay as an added measure of good faith.
10

11 Kymberlie hereby notifies the Court of Appeals of the State of Nevada that
12 the Motion For Stay of District Court Orders contains a page count of 47 which
13 is 37 over the required page count of 10 pursuant to NRAP 27(d)(2).
14

15 DATED this 19th day of April, 2023.
16

17 Pursuant to NRS 53.045, I declare under penalty
18 Of perjury that the foregoing is true and correct.

19 
20

21 Kymberlie Joy Hurd
22 210 Red Coral Dr.
23 Henderson, NV 89002
24 702-285-8149
25 KymberlieJoy@gmail.com
Appellant, In Proper Person

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1. I am the Appellant in the above-entitled action.
2. I have read the foregoing motion and know the contents thereof; that same is true of my own knowledge, except for those matters stated upon information and belief, and that as to those matters, I believe them to be true.

DATED this 19th day of April, 2023.

Page 3 of 4

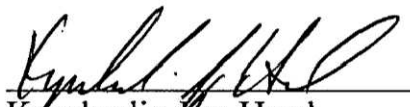
CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of April, 2023, I served a copy of this completed Motion Requesting Leave to File an Expanded Motion For Stay of District Court Orders upon all parties to the appeal as follows:

By mailing it first-class mail with sufficient postage prepaid to the following addresses:

Matthew H. Friedman, Esq.
Christopher B. Phillips, Esq.
Ford & Friedman
2200 Paseo Verde Pkwy., Suite 350
Henderson, NV 89052

DATED this 19th day of April, 2023.


Kymberlie Joy Hurd
210 Red Coral Dr.
Henderson, NV 89002
702-285-8149
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Appellant, In Proper Person