

IN THE SUPREME COURT OF THE STATE OF NEVADA

* * * * *

Case No. 86976

Electronically Filed
Dec 11 2023 02:56 PM
Elizabeth A. Brown
Clerk of Supreme Court

PIERRE A. HASCHEFF,

Appellant/Cross-Respondent,

vs.

LYNDA HASCHEFF,

Respondent/Cross-Appellant.

Appeal From Special Order Entered After Final Judgment
Second Judicial District Court Case No. DV13-00656

**MOTION TO EXCEED PAGE LIMIT FOR
OPPOSITION TO MOTION TO TAKE JUDICIAL NOTICE**

LEONARD LAW, PC
Debbie Leonard (#8260)
955 S. Virginia St., Suite #220
Reno, NV 89502
775-964-4656
debbie@leonardlawpc.com

Attorney for Respondent/Cross-Appellant

POINTS AND AUTHORITIES

Respondent/Cross-Appellant Lynda Hascheff respectfully moves the Court to exceed the 10-page limit imposed by NRAP 27(d)(2) to file her Opposition to Appellant/Cross-Respondent Pierre A. Hascheff's Motion to Take Judicial Notice (the "Motion"). NRAP 27(d)(2) states that a response to a motion shall not exceed 10 pages unless the Court permits or directs otherwise.

Lynda submits that good cause exists for her to file an opposition that is four pages over the limit. In order to fully respond to Pierre's Motion, Lynda's counsel was required to quote extensively from the district court record to demonstrate that the documents of which Pierre requests judicial notice are ones that he strategically withheld from the District Court and Lynda. As these extensive quotes show, Pierre's refusal to produce such documents drove up the fees incurred by Lynda, which is the subject matter of this appeal.

Lynda's counsel worked diligently to present her Opposition as concisely as possible and takes seriously the page limits imposed in the Rules; however, notwithstanding these efforts, four extra pages are needed.

Accordingly, Lynda submits that good cause exists to extend the 10-page limit imposed by NRAP 27(d)(2) and Lynda respectfully requests leave to do so to file an Opposition that is 14 pages long.

AFFIRMATION

Pursuant to NRS 239B.030, the undersigned does hereby affirm that the preceding document does not contain the social security number of any person.

DATED December 11, 2023

LEONARD LAW, PC

By: /s/ Debbie Leonard

Debbie Leonard (NV Bar No. 8260)

955 S. Virginia Street, Suite 220

Reno, Nevada 89502

Phone: (775) 964-4656

debbie@leonardlawpc.com

*Attorney for Respondent/
Cross-Appellant*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of Leonard Law, PC, and that on December 11 2023, a copy of the foregoing document was electronically filed with the Clerk of the Court for the Nevada Supreme Court by using the Nevada Supreme Court's E-Filing system (E-Flex). Participants in the case who are registered with E-Flex as users will be served by the eFlex system. All others will be served by first-class mail.

Therese M. Shanks
Fennemore Craig, P.C.
7800 Rancharra Pkwy
Reno, NV 89511

/s/ Tricia Trevino
An employee of Leonard Law, PC

EXHIBIT 1

EXHIBIT 1

**DECLARATION OF DEBBIE LEONARD IN SUPPORT OF
MOTION TO EXCEED PAGE LIMIT FOR
OPPOSITION TO MOTION TO TAKE JUDICIAL NOTICE**

I, Debbie Leonard, do hereby swear under penalty of perjury that the assertions in this declaration are true and correct.

1. I am over the age of eighteen (18) years. I have personal knowledge of the facts stated within this declaration. If called as a witness, I would be competent to testify to these facts.

2. I am the owner of Leonard Law, PC and counsel of record for Respondent/Cross-Appellant Lynda Hascheff in this case.

3. This declaration is offered in support of Lynda's Motion to Exceed Page Limit for Opposition to Motion to Take Judicial Notice ("Opposition").

4. I have worked diligently to edit and pare down the Opposition. However, in order to fully respond to Pierre's Motion to Take Judicial Notice, I had to quote extensively from the district court record to demonstrate that the documents of which Pierre requests judicial notice are ones that he strategically withheld from the District Court and Lynda. As these extensive quotes show, Pierre's refusal to produce such documents drove up the fees incurred by Lynda, which is the subject matter of this appeal.

5. I take seriously the Court's Rules and page limits and make every effort to conform to them. In this instance, however, four extra pages are needed.

6. I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

DATED December 11, 2023

/s/ Debbie Leonard

Debbie Leonard