**IN THE SUPREME COURT OF THE STATE OF NEVADA**

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| LUBA GONZALEZ N/K/A LUBA SNOW A/K/A LUBA DACE,<br><br>Appellant,<br><br>v.<br><br>ENRIQUE IVAN VELAZQUEZ-GONZALEZ,<br><br>Respondent. | Supreme Court No.: 90570<br><br>Related Appeal no. 84759<br><br>District Court No.: D-18-575860-D |

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Elizabeth A. Brown
Clerk of Supreme Court

**APPELLANT'S MOTION FOR PERMISSION TO ENLARGE THE TYPE-VOLUME LIMITATION ON OPENING BRIEF**

COMES NOW, Appellant, Luba Dace, by and through her attorney, Emily McFarling, Esq. of McFarling Cohen Fic & Squires, and hereby requests an Order granting Appellant's request to enlarge the type-volume limitation on her Opening Brief. This Motion is based upon the Memorandum of Points and Authorities, Declaration of Emily McFarling, Esq., and all other papers and pleadings on file herein.

DATED 15th day of July, 2025.

**MCFARLING COHEN FIC & SQUIRES**
*/s/ Emily McFarling*
Emily McFarling, Esq.
Nevada Bar Number 8567
[redacted]
[redacted]
*Attorney for Appellant, Luba Dace.*



Docket 90570 Document 2025-30836

## MEMORANDUM OF POINTS AND AUTHORITIES

NRAP 32(a)(7)(A)(ii) states an opening or answering brief is acceptable if it contains no more than 14,000 words and a reply brief is acceptable if it contains no more than 7,000 words.

NRAP 32(a)(7)(D) further states that a motion to file a brief that exceeds the applicable type-volume limitation will be granted only upon a showing of diligence and good cause. The rule further states:

> (ii) A motion seeking an enlargement of the page or type-volume limitation for a brief must be filed on or before the brief's due date and must state in detail the reasons for the motion and the number of additional pages, words, or lines of text requested. A motion to exceed the type-volume limitation must be accompanied by a certification as required by Rule 32(a)(9) as to the line or word count.
> (iii) The motion must also be accompanied by a single copy of the brief the applicant proposes to file.

This matter includes ten separate issues and extensive detailed and pre-decree and post-decree litigation history (19 volumes), as well as multiple days of evidentiary hearing.

Therefore, the overall extensive history and facts of the case and issues before this court has caused Appellant to exceed the 14,000 maximum word limitation in her Opening. The brief is a total of 17,882 words (3,882 words exceeding the NRAP limitation).

Appellant's counsel believes to have exercised diligence in keeping Appellant brief limited as much as possible, but still providing a complete brief for this Court's review.

Therefore, Appellant respectfully requests this Court to find good cause and allow Appellant to exceed the volume limitation of 14,000 words to 17,882 words.

This motion is filed timely as July 15, 2025, is the due date of the brief and is supported by the Declaration of Emily McFarling, Esq., Certificate of Compliance, and proposed Opening Brief attached hereto this motion as **Exhibit 1/A**.

DATED this 15th day of July, 2025.

**MCFARLING COHEN FIC & SQUIRES**

*/s/ Emily McFarling*

Emily McFarling, Esq.
Nevada Bar Number 8567
[redacted]
*Attorney for Appellant, Luba Dace*

## CERTIFICATE OF COMPLIANCE

I hereby certify that this Motion complies with the formatting requirements of NRAP 27(d)(1)(D), the typeface requirements of NRAP 32(a)(5) and the type style requirements of NRAP 32(a)(6), because this Motion has been prepared in a proportionally spaced typeface using Microsoft Word for Office 365 in Times New Roman and 14 pt. font.

I further certify that this Motion complies with the page- or type volume limitations of NRAP 27(d)(2)(A) because excluding the accompanying documents authorized by Rule 27(a)(2)(B): it is proportionately spaced, has a typeface of 14 points or more, was produced by a computer and contains 853 words.

DATED 15th day of July, 2025.

**MCFARLING COHEN FIC & SQURIES**

*/s/ Emily McFarling*
Emily McFarling, Esq
Nevada Bar Number 8567
[redacted]
*Attorney for Appellant, Luba Dace.*

## DECLARATION EMILY MCFARLING, ESQ.

I, Emily McFarling, Esq., declare under penalty of perjury under the laws of the State of Nevada that the following is true and correct:

1. I represent the Appellant in the above-entitled case.

2. I have read the attached motion and know the contents thereof; the same is true of my own knowledge, except for those matters stated upon information and belief and, as to those matters, I believe them to be true.

I declare under penalty of perjury, under the laws of the State of Nevada and the United States (NRS 53.045 and 28 USC § 1746), that the foregoing is true and correct.

DATED this 15th day of May, 2025.

**MCFARLING COHEN FIC & SQURIES**

*/s/ Emily McFarling*
Emily McFarling, Esq.
Nevada Bar Number 8567
[redacted]
*Attorney for Appellant, Luba Dace.*

## CERTIFICATE OF SERVICE

I, an employee of McFarling Cohen Fic & Squires, hereby certify that on the 15th day of July, 2025, I served a true and correct copy of Appellant's Motion for Permission to Enlarge the Type-Volume Limitation on Opening Brief as follows:

☒ via the Supreme Court's electronic filing and service system (eFlex):

MELVIN R. GRIMES, ESQ.

*Attorney for Respondent*

*/s/ Rebeca Renderos*

Rebeca Renderos