IN THE SUPREME COURT OF THE STATE OF NEVADA

LUBA GONZALEZ N/K/A LUBA SNOW A/K/A DACE, Appellant, v. ENRIQUE IVAN VELAZQUEZ-GONZALEZ, Respondent.	)	Supreme Court Case No.: 90570

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Elizabeth A. Brown
Clerk of Supreme Court

MOTION TO EXTEND TIME TO FILE FAST TRACK ANSWERING BRIEF [FIRST REQUEST]

COMES NOW Enrique Velazquez-Gonzalez, Respondent, by and through his attorneys of record, Melvin R. Grimes, Esq. and Amanda M. Roberts, Esq., of Roberts Stoffel Family Law Group, and hereby submits this Motion to Extend Time to File Fast Track Answering Brief [First Request] until September 19, 2025.

DATED this 22nd day of August, 2025.

Roberts Stoffel Family Law Group

By: /s/ Amanda M. Roberts, Esq.
Amanda M. Roberts, Esq.
State of Nevada Bar No. 9294
[redacted]

Docket 90570 Document 2025-36990

MEMORANDUM OF POINTS AND AUTHORITIES

NRAP § 31 (b)(3) provides, "A motion for extension of time for filing a brief may be made no later than the due date for the brief and must comply with the provisions of this Rule and Rule 27. Timeliness of the motion is governed by Rule 25(a)(2)."

NRAP § 31 (b)(3)(A) requests the following information be provided:

(i) When the brief is due and was first due: In this matter, the Answering Brief was first due on August 22, 2025 with a Motion granting an extension until September 19, 2025.

(ii) The number of extensions previously granted (including any streamlined extension): In this matter, no extension has been previously requested by Respondent.

(iii) Whether any previous extensions have been denied or denied in part: Not Applicable.

(iv) The reasons or grounds why an extension is necessary:

Appellant's Counsel, Melvin Grimes, has been ill and was hospitalized thus requiring another attorney from Roberts Stoffel Family Law Group to be acquainted with the file and work to finalize the Answering Brief. Attorney Grimes has since been moved to a rehabilitation facility, but is back in the hospital.

Thus it is unlikely he would be able to assist Ms. Roberts is preparing the Answering Brief.

(v) The length of the extension requested and when the brief would become due: Enrique Velazquez-Gonzalez, Respondent, respectfully requests that the Court grant an extension of the current deadline to September 19, 2025, which constitutes a twenty-eight day extension from the original due date

CONCLUSION

For the reasons set-forth above, Enrique Velazquez-Gonzalez, Respondent, respectfully request the Court grant their request for an extension for the Respondent to file his Fast Track Answering Brief until September 19, 2025.

DATED this 22nd day of August, 2025.

Roberts Stoffel Family Law Group

By: /s/ Amanda M. Roberts, Esq.
Amanda M. Roberts, Esq.
State of Nevada Bar No. 9294
[redacted]

CERTIFICATE OF COMPLIANCE (*NRAP* § 32 (a)(9)

1. I hereby certify that this brief complies with the formatting requirements of NRAP 32(a)(4), the typeface requirements of NRAP 32(a)(5) and the type style requirements of NRAP 32(a)(6) because:

☒ This brief has been prepared in a proportionally spaced typeface using Microsoft Word Version 2405 in 14 point, Times New Roman; or

☐ This brief has been prepared in a monospaced typeface using [*state name and version of word-processing program*] with [*state number of characters per inch and name of type style*].

2. I further certify that this brief complies with the page- or type-volume limitations of NRAP 40, 40A, or 40B because it is either:

☒ Proportionately spaced, has a typeface of 14 points or more, and contains 878 words; or

☐ Monospaced, has 10.5 or fewer characters per inch, and contains _____ words or _____ lines of text; or

☐ Does not exceed _____ pages.

3. Finally, I hereby certify that I have read this appellate brief, and to the best of my knowledge, information, and belief, it is not frivolous or interposed for any improper purpose. I further certify that this brief complies with all applicable Nevada Rules of Appellate Procedure,

including NRAP 28(e)(1), if applicable, which requires every assertion in the brief regarding matters in the record to be supported by a reference to the page and volume number, if any, of the transcript or appendix where the matter relied on is to be found. I understand that I may be subject to sanctions in the event that the accompanying brief is not in conformity with the requirements of the Nevada Rules of Appellate Procedure.

DATED this 22nd day of August, 2025.

Roberts Stoffel Family Law Group

By: /s/ Amanda M. Roberts, Esq.
Amanda M. Roberts, Esq.
State of Nevada Bar No. 9294
[redacted]

CERTIFICATE OF SERVICE

I, an employee of Roberts Stoffel Family Law Group, hereby certify that on 22nd day of August, 2025, I served a true and correct copy of this Motion to Extend Time to File Fast Track Answering Brief [First Request] via the Supreme Court's electronic filing and service system (eFlex):

Emily McFarling, Esq.
Attorney for Respondent

By: */s/ Colleen O'Brien*
Employee of Roberts Stoffel Family Law Group