IN THE SUPREME COURT OF THE STATE OF NEVADA

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

Electronically Filed
Mar 16 2026 01:33 PM
Elizabeth A. Brown
Clerk of Supreme Court

APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE PETITION FOR REVIEW BY THE SUPREME COURT PURSUANT TO NRAP 40B & FOR THE PETITION TO BE CONSIDERED TIMELY

COMES NOW, Appellant, Luba Dace, by and through her attorney, Emily McFarling, Esq. of McFarling Cohen Fic & Squires, and hereby requests an Order extending the time to file the Appellant's Petition for Review by the Supreme Court Pursuant to NRAP 40B. 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.

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Docket 90570 Document 2026-12200

DATED this 16th day of March, 2026.

MCFARLING COHEN FIC & SQUIRES

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

MEMORANDUM OF POINTS AND AUTHORITIES

Pursuant to NRAP 27, Appellant respectfully moves this Court for a one-day extension of time to file Appellant's Petition for Review pursuant to NRAP 40B. Good cause exists for the requested extension because Appellant made a diligent and good-faith effort to timely file the Petition, but was prevented from doing so due to technical issues with the Nevada Supreme Court's electronic filing system.

Appellant attempted to submit the Petition on Friday, March 13, 2026, the applicable filing deadline. However, the Supreme Court's electronic filing system was intermittently unavailable that day, preventing Appellant from completing the filing despite multiple attempts. The inability to access the filing system was entirely outside of Appellant's control.

In an effort to document the timely attempt to file, Appellant's counsel promptly emailed the Supreme Court Clerk attaching the Petition and providing screenshots demonstrating that the filing system was unavailable (**attached as Exhibit 1**). These efforts reflect Appellant's diligence and good-faith attempt to comply with the filing deadline.

The requested extension is minimal—only one day—and will not prejudice any party or delay the proceedings. Rather, granting the requested relief will ensure

that Appellant's Petition for Review is considered on its merits where the delay resulted solely from technical difficulties with the Court's filing system.

Accordingly, Appellant respectfully requests that this Court grant a one-day extension of time to file Appellant's Petition for Review pursuant to NRAP 40B and deem the Petition timely filed as of March 16, 2026.

DATED this 16th day of March, 2026.

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 830 words.

DATED this 16th day of March, 2026.

MCFARLING LAW GROUP

/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 16th day of March, 2026.

MCFARLING COHEN FIC & SQUIRES

/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 16th day of March, 2026, I served a true and correct copy of Appellant's Motion for Extension of Time to File the Petition for Review by the Supreme Court pursuant to NRAP 40B for the Petition to be considered timely as follows:

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

Amanda M. Roberts, Esq.
Melvin R. Grimes, Esq.
Attorneys for Respondent

/s/ Rebeca Renderos
Rebeca Renderos

EXHIBIT 1

Rebeca Renderos

From: Rebeca Renderos
Sent: Friday, March 13, 2026 10:26 PM
To: Supreme Court Clerk
Cc: Julie Bravo-Bezard; Julie Bravo-Bezard; Emily McFarling (mcfarlinglaw); MLG Eservice
Subject: Luba Dace - Supreme Court Case Number 90570 - Eflex Website Down Again
Attachments: DaceNewPetitionForReviewSupremeCourt031326.pdf; EflexDown031326.png; Efllex still down.png

Importance: High

Dear Sir or Madam,

Please be advised that I have been experiencing issues with filings this week due to the Supreme Court's Eflex website being down intermittently.

I have attempted several times to file the attached Petition for Supreme Court Review, which is due to be filed today, but have been unsuccessful due to the Eflex website being unavailable.

I have attached proof of the error messages received from Eflex when attempting to log in and file. I also attempted to file through two different internet browsers and received the same error message.

Please advise whether we should proceed with drafting and filing a Notice or Motion with the Court attaching proof of the attempted timely filing and the error messages received from the e-filing website.

Thank you for your guidance.

Rebeca Renderos| Paralegal

CFS
Cohen Fic & Squires
Las Vegas location: [redacted]
Henderson location: [redacted]
Website: www.cfslawyers.com
[redacted]

NOTICE: For case related emails, please courtesy copy [redacted] and reply all to ensure our team receives your correspondence or documents immediately.

CONFIDENTIALITY WARNING: This e-mail and any attachments are for the exclusive and confidential use of the intended recipient. If you are not the intended recipient, please do not read, distribute or take

action in reliance upon this missive. If you have received this in error, please notify the sender immediately by reply e-mail and delete this message and its attachments from your computer system. We do not waive any attorney-client, work product or other privilege by sending this email or attachment.