

No. _____

IN THE
Supreme Court of the United States

LYUDMYLA ABID

Petitioner,

v.

SEAN ABID

Respondent.

APPLICATION FOR EXTENSION OF TIME TO
FILE A PETITION FOR A WRIT OF CERTIORARI

JOHN D. JONES
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JUL 24 2018

OFFICE OF THE CLERK
SUPREME COURT, U.S.

**TO THE HONORABLE JUSTICES OF THE SUPREME COURT
OF THE UNITED STATES:**

Pursuant to Supreme Court Rules 13.5, 22, and 30, Petitioner respectfully requests a 60-day extension of time, up to and including September 24, 2018, to file a Petition for a Writ of Certiorari to The Nevada Supreme Court to review that Court's decision in *Abid v. Abid* 133 Nev. Adv. Opn. No. 94 (attached hereto as Exhibit A). Supreme Court Rule 12.4. The jurisdiction of this Court will be invoked under 28 U.S.C. § 1254(1), and the time to file a petition for a writ of certiorari will expire without an extension on July 26, 2018. This application is timely because it has been filed more than ten days prior to the date on which the time for filing the petition is to expire.

This case presents a substantial and important question of federal law:

- Whether Title III of the Omnibus Crime Control and Safe Streets Act of 1968, 18 U.S.C. 2510-2520 is Preempted Law that requires suppression of evidence obtained illegally in child custody cases when no child abuse or neglect was alleged. Below, the Nevada Supreme Court held that any illegally obtained recordings are admissible in child custody cases and suppression of illegally obtained tapes only applies to criminal cases in Nevada. In so doing, Nevada weakened Title III of the Omnibus Crime Control

and Safe Streets Act and essentially declared that, in Nevada, divorced parents who have custody of their children no longer have privacy in their homes; and that, moving forward, the courts will publish and play openly in court trials illegally obtained tapes on “what if” basis.

- Whether Due process of law is guaranteed by the Fourteenth Amendment of the United States Constitution when a child interview conducted by an expert in child custody is not audio or video recorded in accordance to The Uniform Child Witness Testimony by Alternative Methods Act.

Petitioner is diligently working on the Petition for a Writ of Certiorari. However, she is not an attorney, English is not her first language, and it has taken her longer than expected to prepare the document. In addition, Petitioner is currently in Ukraine, visiting her family due terminal illness of her father who is fighting cancer on late stage and facing health implications. Petitioner is returning back to US on July 30, 2018.

Accordingly, Petitioner respectfully requests that an order be entered extending the time to file a petition for a writ of certiorari for 60 days, up to and including September 24, 2018.

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DATED this 13th day of July, 2018.

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CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of July, 2018, the foregoing was served upon the following persons and entities entitled to notice, by mailing a true and complete copy thereof, via US Mail, first class mail, postage prepaid, to the following at their last known address:

John Jones, Esq., Bar No. 006699
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Attorney for Respondent

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

DATED this 13th day of July, 2018.

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