

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

2 MATT KLABACKA,  
3 DISTRIBUTION TRUSTEE OF  
4 THE ERIC L. NELSON NEVADA  
TRUST DATED MAY 30, 2001,

5 Appellant/Cross-Respondent,  
6 and

7 LYNITA SUE NELSON,  
8 INDIVIDUALLY, AND IN HER  
CAPACITY AS INVESTMENT  
9 TRUSTEE OF THE LSN NEVADA  
TRUST DATED MAY 30, 2001,  
10 AND ERIC L. NELSON,  
INDIVIDUALLY,  
11 AND IN HIS CAPACITY AS  
INVESTMENT TRUSTEE OF THE  
ERIC L. NELSON NEVADA  
12 TRUST DATED MAY 30, 2001,

13 Respondents/Cross-Appellants.

SUPREME COURT CASE NO.: 66772

Consolidated Case No. 18292 Electronically Filed

Jan 29 2016 03:17 p.m.

Tracie K. Lindeman  
Clerk of Supreme Court

14  
15  
16       RESPONDENT/CROSS-APPELLANT, LYNITA SUE NELSON'S, MOTION  
17       FOR APPROVAL OF PARTIES' STIPULATION FOR EXTENSION OF TIME  
18       TO FILE RESPONDENTS'/CROSS-APPELLANTS' COMBINED  
19       ANSWERING BRIEFS AND OPENING BRIEF ON CROSS-APPEAL, AND TO  
20       FILE APPELLANT'S REPLY BRIEF ON APPEAL AND ANSWERING BRIEF  
21       ON CROSS-APPEAL

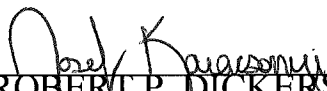
22       COMES NOW, Respondent/Cross-Appellant, LYNITA SUE NELSON  
23 ("Lynita"), individually and in her capacity as Investment Trustee of the LSN Nevada  
24 Trust dated May 30, 2001, and hereby files with the Court the Stipulation for  
25 Extension of Time to File Respondents'/Cross-Appellants' Combined Answering  
26 Briefs and Opening Brief on Cross-Appeal, and to File Appellant's Reply Brief on  
27 Appeal and Answering Brief on Cross-Appeal ("Stipulation for Extension of Time"),  
28 entered into today between all parties to this appeal. Said Stipulation for Extension  
of Time is attached hereto as Exhibit A. As set forth in the Stipulation for Extension  
of Time, the parties respectfully request that the same be treated as a joint request and  
...

1 motion by the parties for the extensions of time described therein, and approved by  
2 the Court.

3 If the Court approves of the stipulated extensions of time detailed in the  
4 attached Stipulation for Extension of Time, Lynita's Motion for Extension of Time to  
5 File Answering Brief on Appeal, and Opening Brief on Cross-Appeal filed earlier this  
6 date will be moot.

7 DATED this 29<sup>th</sup> day of January, 2016.

8 THE DICKERSON LAW GROUP

9  
10 By  \_\_\_\_\_  
11 ROBERT P. DICKERSON, ESQ.  
12 Nevada Bar No. 000945  
13 JOSEF M. KARACSONYI, ESQ.  
14 Nevada Bar No. 010634  
15 KATHERINE L. PROVOST, ESQ.  
16 Nevada Bar No. 008414  
17 1745 Village Center Circle  
18 Las Vegas, NV 89134  
19 Attorneys for Respondent/Cross-Appellant  
20  
21  
22  
23  
24  
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28

1 CERTIFICATE OF SERVICE

2 I certify that I am an employee of THE DICKERSON LAW GROUP, and that  
3 on this 29<sup>th</sup> day of January, 2016, I filed a true and correct copy of the foregoing  
4 RESPONDENT/CROSS-APPELLANT, LYNITA SUE NELSON'S, MOTION FOR  
5 APPROVAL OF PARTIES' STIPULATION FOR EXTENSION OF TIME TO FILE  
6 RESPONDENTS'/CROSS-APPELLANTS' COMBINED ANSWERING BRIEFS  
7 AND OPENING BRIEF ON CROSS-APPEAL, AND TO FILE APPELLANT'S  
8 REPLY BRIEF ON APPEAL AND ANSWERING BRIEF ON CROSS-APPEAL,  
9 with the Clerk of the Court through the Court's eFlex electronic filing system and  
10 notice will be sent electronically by the Court to the following:

11 RHONDA K. FORSBERG, ESQ .  
12 FORSBERG LAW OFFICE  
13 64 North Pecos Road, Ste. 800  
Henderson, Nevada 89074  
Attorneys for Respondent/Cross-Appellant, ERIC L. NELSON

14 MARK A. SOLOMON, ESQ.  
15 JEFFREY P. LUSZECK, ESQ.  
16 SOLOMON, DWIGGINS, FREER & MORSE, LTD.  
9060 W. Cheyenne Avenue  
Las Vegas, Nevada 89129  
Attorneys for Appellant, MATT KLABACKA

17   
18 An employee of The Dickerson Law Group  
19  
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23  
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26  
27  
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# Exhibit “A”

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

MATT KLABACKA, Distribution Trustee  
of the Eric L. Nelson Nevada Trust dated  
May30, 2001,  
Appellant/Cross Respondent.

vs.

LYNITA SUE NELSON, Individually and  
in her capacity as Investment Trustee of the  
LSN NEVADA TRUST dated May 30,  
2001; and ERIC L. NELSON, Individually  
and in his capacity as Investment Trustee  
of the ELN NEVADA TRUST dated May  
30, 2001;

Respondents/Cross-  
Appellants.

**Supreme Court Case No. 66772  
District Court Case No. D411537**

MATT KLABACKA, as Distribution  
Trustee of the Eric L. Nelson Nevada Trust  
dated May30, 2001,  
Appellants,

vs.

ERIC L. NELSON; LYNITA SUE  
NELSON, INDIVIDUALLY; AND LSN  
NEVADA TRUST DATED MAY 30,  
2001,

Respondents.

**Consolidated With:  
Supreme Court Case No. 68292**

**STIPULATION FOR EXTENSION OF TIME TO FILE  
RESPONDENTS'/CROSS-APPELLANTS' COMBINED ANSWERING  
BRIEFS AND OPENING BRIEF ON CROSS-APPEAL, AND TO FILE  
APPELLANT'S REPLY BRIEF ON APPEAL AND ANSWERING BRIEF  
ON CROSS-APPEAL**

Pursuant to Nevada Rules of Appellate Procedure (31)(b)(2), Appellant/Cross  
Respondent, Matt Klabacka, as Distribution Trustee of the Eric L. Nelson Nevada  
Trust dated May 30, 2001 ("ELN Trust"), by and through his attorneys, Mark A.  
Solomon, Esq. and Jeffrey P. Luszeck, Esq. of the law firm of Solomon Dwiggins

1 & Freer, Ltd., Respondent/Cross Appellant, Lynita Sue Nelson ("Lynita"), by and  
2 through her attorneys, Robert P. Dickerson, Esq., Katherine L. Provost, Esq., and  
3 Josef M. Karacsonyi, Esq., of The Dickerson Law Group, and Respondent/Cross  
4 Appellant, Eric L. Nelson ("Eric"), by and through his attorney, Rhonda K.  
5 Forsberg, Esq. of the law firm of Rhonda K. Forsberg Chartered, hereby stipulate  
6 and agree as follows:  
7

8 IT IS HEREBY STIPULATED that Eric's and the ELN Trust's counsels have  
9 received and reviewed the Motion for Extension of Time to File Answering Brief  
10 on Appeal and Opening Brief on Cross-Appeal filed by Lynita, and have no  
11 objection to same. Eric similarly requires an extension of time to file his  
12 Answering Brief on Appeal and Opening Brief on Cross-Appeal, and the parties  
13 respectfully request that the Court further revise the deadlines in this matter as set  
14 forth herein.  
15

16 IT IS FURTHER STIPULATED that due to the complexity of this matter and  
17 volume of information, and to avoid the necessity of any further extensions for Eric  
18 and Lynita to file their answering briefs on appeal and opening briefs on cross-  
19 appeal, the due date for Eric's and Lynita's answering briefs on appeal and opening  
20 briefs on cross-appeal should be extended from February 1, 2016, to March 1, 2016  
21 (rather than February 16, 2016 as requested in Lynita's motion). This will allow  
22 Eric and Lynita a total extension of time similar to the extension of time agreed to  
23 by the parties for the filing of the ELN trust's Opening Brief.  
24  
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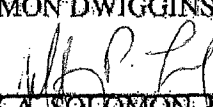
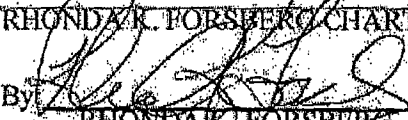
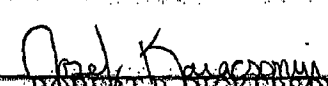
9600 WEST CHEYENNE AVENUE  
LAS VEGAS, NEVADA 89129  
TELEPHONE (702) 853-3443  
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SOLOMON  
DWIGGINS & FREER

1 IT IS FURTHER STIPULATED that due to the fact that this matter involves  
2 multiple parties and contains voluminous records, Appellant should also have an  
3 extension beyond 30 days to file the combined reply brief on appeal and answering  
4 brief on cross-appeal, and the due date for same should be set for April 15, 2016 if  
5 the Court grants the parties' stipulation for Eric's and Lynita's briefs to be due on  
6 March 1, 2016.  
7

8 IT IS FURTHER STIPULATED that the parties respectfully request that this  
9 Stipulation be treated as a joint request/motion by the parties for the extensions of  
10 time described above.  
11

12 Dated this 29<sup>th</sup> day of January, 2016.

13 14 15 16 17 18	SOLOMON DWIGGINS & FREER, LTD.  MARK A. SOLOMON, ESQ. Nevada State Bar No. 0418 JEFFREY P. LUSZECK Nevada State Bar No. 9619 9060 W. Cheyenne Avenue Las Vegas, Nevada 89129 Attorneys for Appellant/Cross-Respondent, Matt Klucka Distribution Trustee of the Eric L. Nelson Nevada Trust dated May 30, 2001.	13 14 15 16 17 18	RHONDA K. FORSBERG CHARTERED By:  RHONDA K. FORSBERG, ESQ. Nevada Bar No. 9557 64 N. Pecos Road, Suite 800 Henderson, NV 89074 Attorneys for Eric L. Nelson
19 20 21 22 23 24 25	THE DICKERSON LAW GROUP By:  ROBERT P. DICKERSON, ESQ. Nevada Bar No. 0945 KATHERINE L. PROVOST, ESQ. Nevada Bar No. 8414 JOSEF M. KARACSONYI, ESQ. Nevada Bar No. 10634 1745 Village Center Circle Las Vegas, NV 89134 Attorneys for Lynita S. Nelson	19 20 21 22 23 24 25	

**Solo** **SOLOMON**  
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