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

NANYAH VEGAS, LLC, a Nevada  
limited liability company,

Appellant

v.

SIG ROGICH a/s/a SIGMUND  
ROGICH as Trustee of The Rogich  
Family Irrevocable Trust, ELDORADO  
HILLS, LLC, a Nevada limited liability  
company; DOES 1-X; and/or ROE  
CORPORATIONS 1-x, inclusive

Respondents

Case No. 66823

District Court Clerk KALINDA

Electronically Filed  
Jul 21 2015 11:35 a.m.  
Tracie KALINDA  
Clerk of Supreme Court

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**APPEAL**

From the Eighth Judicial District Court  
The Honorable Nancy L. Allf, District Judge

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**RESPONDENTS ANSWERING BRIEF  
SUPPLEMENTAL APPENDIX**

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Samuel S. Lionel  
FENNEMORE CRAIG, P.C.  
Nevada State Bar No. 1766  
300 S. Fourth Street, Suite 1400  
Las Vegas, NV 89101  
Telephone: 702-692-8000  
Facsimile: 702-692-8099  
Attorneys for Respondents

1 Appellant's Opening Brief cites Sig Rogich, the Trustee of the Rogich  
2 Family Irrevocable Trust's, Interrogatory Answers for certain  
3 representations Op.Br. at 16:8-12. The citation to the Interrogatories is  
4 erroneous and they do not appear to be in Appellant's Appendix.  
5

6 Attached is a copy of the Interrogatories.  
7

8 Dated this 13<sup>th</sup> day of July, 2015.  
9

FENNEMORE CRAIG, P.C.

10 By   
11 Samuel S. Lionel, Esq.  
12 Nevada State Bar No. 1766  
13 300 S. Fourth Street, #1400  
14 Las Vegas, NV 89101  
15 Attorneys for Respondents  
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| <b>1</b>              | <b>RES001-008</b>      | <b>Sig Rogich as Trustee<br/>of the Rogich Family<br/>Irrevocable Trust<br/>Answers to Plaintiffs<br/>First Set of<br/>Interrogatories</b> |

# EXHIBIT 1

ORIGINAL

1 **ANS**

2 Samuel S. Lionel, NV Bar No. 1766

3 *slionel@lionelsawyer.com*

4 LIONEL SAWYER & COLLINS

5 300 South Fourth Street, Suite 1700

6 Las Vegas, Nevada 89101

7 Tel: (702) 383-8888

8 Fax: (702) 383-8845

9 *Attorneys for Defendant Sig Rogich*  
10 *aka Sigmund Rogich as Trustee of*  
11 *The Rogich Family Irrevocable Trust*

DISTRICT COURT

CLARK COUNTY, NEVADA

12 CARLOS A. HUERTA, an individual,  
13 CARLOS A. HUERTA as Trustee of THE  
14 ALEXANDER CHRISTOPHER TRUST, a  
15 Trust established in Nevada as assignee of  
16 interests of GO GLOBAL, INC., a Nevada  
17 corporation NANYAH VEGAS, LLC, a  
18 Nevada limited liability company;

19 Plaintiffs,

20 v.

21 SIG ROGICH aka SIGMUND ROGICH as  
22 Trustee of The Rogich Family Irrevocable  
23 Trust; ELDORADO HILLS, LLC, a Nevada  
24 limited liability company; DOES I-X, and or  
25 ROE CORPORATIONS I-X, inclusive

26 Defendants.

27 AND ALL RELATED MATTERS

Case No.: A-13-686303-C

Dept. No.: XXVII

28 **SIG ROGICH AS TRUSTEE OF ROGICH FAMILY IRREVOCABLE TRUST**  
**ANSWERS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES**

29 TO: Plaintiffs; and

30 TO: Mr. Brandon McDonald, their attorney of record.

1 DEFENDANT SIG ROGICH AS TRUSTEE OF ROGICH FAMILY IRREVOCABLE  
2 TRUST ("Rogich Trust") answers to Plaintiff's First Set of Interrogatories as follows:

3 ANSWERS

4 INTERROGATORY NO. 1:

5 Please identify any and all individuals which assisted in the preparation of responses to  
6 these interrogatories, and specifically identify.

- 7 (a) Name of individual;  
8 (b) Address;  
9 (c) Telephone number; and  
10 (d) Relation to answering Plaintiff.

11 ANSWER TO INTERROGATORY NO. 1:

12 Melissa Olivas, Samuel S. Lionel.

13 INTERROGATORY NO. 2:

14 Please state what consideration you were given by Eldorado Hills, LLC for conveying  
15 your interest held on 2012 in Eldorado Hills, LLC.

16 ANSWER TO INTERROGATORY NO. 2:

17 None.

18 INTERROGATORY NO. 3:

19 Please state why you decided to surrender your interests in Eldorado Hills, LLC.

20 ANSWER TO INTERROGATORY NO. 3:

21 Uneconomic. Management disagreements.

22 INTERROGATORY NO. 4:

23 Please identify when you informed Carlos Huerta that you no longer had your  
24 membership interests in Eldorado Hills, LLC.

25 ANSWER TO INTERROGATORY NO. 4:

26 Early fall 2012.

27 ///

28 ///

1 **INTERROGATORY NO. 5:**

2 In regards to the prior interrogatory, please identify how you communicated to Carlos  
3 Huerta, that you no longer had your membership interests in Eldorado Hills, LLC.

4 **ANSWER TO INTERROGATORY NO. 5:**

5 Telephone.

6 **INTERROGATORY NO. 6:**

7 Please state whether you informed Carlos Huerta that pursuant the Membership Interest  
8 Assignment Agreement dated January 1, 2012 you received \$682,080.00 for your membership  
9 interests in Eldorado Hills.

10 **ANSWER TO INTERROGATORY NO. 6:**

11 No.

12 **INTERROGATORY NO. 7:**

13 Did you receive any other interests in money and/or property in exchange for your  
14 conveyance of your Eldorado Hills, LLC membership interests?

15 **ANSWER TO INTERROGATORY NO. 7:**

16 No interest in money <sup>or</sup> ~~was~~ property was received.

17 **INTERROGATORY NO. 8:**

18 Are there any existing agreements, understandings, or promises to pay you future money  
19 and/or property(ies) or benefits, of any kind from the sale of the Eldorado Hills, LLC  
20 property(ies)?

21 **ANSWER TO INTERROGATORY NO. 8:**

22 No.

23 **INTERROGATORY NO. 9:**

24 Are there any existing agreements, understandings, or promises to pay you future money  
25 and/or property(ies) or benefits, of any kind from any business(es) being run on the Eldorado  
26 Hills, LLC property?

27 **ANSWER TO INTERROGATORY NO. 9:**

28 No.

1 INTERROGATORY NO. 10:

2 Please indicate which companies that you, personally, or your trust have obtained interest  
3 in, from 2008 to present.

4 ANSWER TO INTERROGATORY NO. 10:

5 Bistro Central LV LLC  
6 China/US Club  
7 ESW, LLC  
8 HealthFusion  
9 Imitations LLC  
10 MMAWC LLC  
11 Quarter Note  
12 RCG Asia  
13 Rhythum LLC  
14 St Global Ventures, LLC  
15 St Global Ventures, LLC - STG Series  
16 St Global Ventures, LLC - STR Series  
17 Western Skies Holdings  
18 The Food Magazine  
19 V-Brooks, LLC

20 INTERROGATORY NO. 11:

21 Please identify any companies and/or partnerships that you or any of your trusts have  
22 held with or received from either TELD, Peter Eliades and/or any of his businesses, properties,  
23 or businesses, Imitations, LLC or any other entities, businesses, or assets that either of the above  
24 have shared or share in common, since 2008 to present.

25 ANSWER TO INTERROGATORY NO. 11:

26 Eldorado Hills, LLC  
27  
28



1 **INTERROGATORY NO. 12:**

2 With regard to any K-1 interest forms from companies and/or partnerships that you or  
3 any of your trusts have received, since 2009 concurrently provided in response to the requests for  
4 production of documents, please provide an explanation to those which may have a connection to  
5 or shared or share something in common with TELD, any of its principals, Peter Eliades or any  
6 of his entities or businesses.

7 **ANSWER TO INTERROGATORY NO. 12:**

8 Eldorado Hills, LLC

9 **INTERROGATORY NO. 13:**

10 In regards to financial records that were kept by Eldorado Hills, LLC from November  
11 2008 to the present, please identify:

- 12 a. Who has kept the financial records;  
13 b. How the financial records were kept; and  
14 c. Which employee(s) of Eldorado Hills, LLC and/or Sigmund Rogich (or his  
15 entities) were responsible for maintaining the financial records.

16 **ANSWER TO INTERROGATORY NO. 13:**

- 17 a. Melissa Olivas, Vallee Swan  
18 b. QuickBooks  
19 c. Melissa Olivas, Vallee Swan

20 **INTERROGATORY NO. 14:**

21 For any response to the Propounding Party's First Set of Requests for Admissions  
22 propounded concurrently herewith that you did not unequivocally admit, state:

- 23 a. The number of the particular request;  
24 b. The particular facts upon which the response is based; and  
25 c. The names, addresses, and telephone numbers of all individuals who have  
26 knowledge of the particular facts upon which the response is based.

ANSWER TO INTERROGATORY NO. 14:

- a. 1.  
b. See Purchase Agreement.  
c. Carlos Huerta, Sig Rogich, Ken Woloson.

- a. 2.  
b. See Answers to Interrogatory 4.  
c. Carlos Huerta, Sig Rogich.

- a. 3.  
b. Sigmund Rogich's intentions.  
c. Sig Rogich

- a. 4.  
b. See Purchase Agreement.  
c. Carlos Huerta, Sig Rogich.

- a. 5.  
b. No such representation.  
c. Sig Rogich.

DATED: July 24, 2014.

LIONEL SAWYER & COLLINS

By: 

Samuel S. Lionel, NV Bar No. 1766  
slionel@lionelsawyer.com

*Attorneys for Defendant Sig Rogich as  
Trustee of The Rogich Family Irrevocable  
Trust*

VERIFICATION

SIGMUND ROGICH, under penalty of perjury, being first duly sworn, deposes and says, that I am the Trustee of the Rogich Family Irrevocable Trust; that I have read the foregoing Answers to Plaintiff's First Set of Interrogatories and know the contents thereof; that the same are true of my own knowledge, except for those matters there contained stated upon information and belief, and as to those matters, I believe them to be true.

Dated: July 29<sup>th</sup>, 2014.

By:

  
SIGMUND ROGICH, Trustee of  
The Rogich Family Irrevocable Trust

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of July, 2014, I deposited in the United States Mail in Las Vegas, Nevada a true and correct copy of the foregoing **DEFENDANTS' ANSWERS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES TO SIG ROGICH** in an envelope upon which first class postage was paid, addressed to the following:

Brandon B. McDonald, Esq.  
MCDONALD LAW OFFICES, PLLC  
2505 Anthem Village Drive, Ste. E-474  
Henderson, NV 89052

*Attorney for the Plaintiffs*

  
Felicia Darenbourg, an Employee of  
Lionel Sawyer & Collins