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

CARLOS A. HUERTA, an individual; CARLOS
A. HUERTA as Trustee of THE ALEXANDER
CHRISTOPHER TRUST, a Trust established in
Nevada as assignee of interests of GO GLOBAL,
INC., a Nevada corporation;

Case No. 67595

District Court Case No.: A-686303

Appellants,

v.

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

Respondents.

AND ALL RELATED MATTERS

**APPELLANTS' MOTION TO EXTEND BRIEFING SCHEDULE
(First Request)**

Appellants, by and through their counsel of record, Brandon B. McDonald, Esq. of McDonald
Law Offices, PLLC hereby files this Motion to Extend Briefing Schedule. Appellants need additional
time to submit an appeal, due to the inability to communicate with the clients, issues with available firm
staff, etc. Appellants have also tendered a settlement offer and would like to explore that possibility
rather than compelling the parties to carry through with the appellate process. This matter has not been

subject to other requests for extension, as this is the first request.

This Motion is based upon the points and authorities attached hereto, all of the documents submitted to date and specifically the respective appeals.

MEMORANDUM OF POINTS AND AUTHORITIES

I.

BRIEF STATEMENT OF FACTS

Appellants need additional time to submit an appeal. Declaration of Brandon McDonald (“McDonald Declaration”), attached herein as Exhibit 1 at ¶2. Appellants are traveling, making meaningful communication with the clients difficult. The firm’s staff is also dealing with sensitive family issues which require their immediate attention. Appellants have also tendered a settlement offer and would like to obtain a response, which may render the appeal moot. McDonald Declaration at ¶3. Appellants believe that an extension of 90 days will be ample time to properly brief this matter and coordinate with respondents. *Id.* at ¶4.

II.

LEGAL ARGUMENT

A. THE BRIEFING SCHEDULE SHOULD BE EXTENDED TO ALLOW APPELLANT ADEQUATE TIME TO BRIEF THIS MATTER AND COORDINATE WITH RESPONDENTS.

The briefing schedule should be continued to allow the Appellant adequate time to brief this matter and coordinate with opposing counsel regarding the joint appendix. *See generally* McDonald Declaration. Therefore, Appellants requests an extension of the briefing schedule for at least 90 days to allow time to act without unnecessary haste.

1. Appellant Has Complied With NRAP 31(3)(A) By Providing the Information Below and Herein.

The briefing schedule of the appeals should be extended. Pursuant to NRAP 31(3)(A), a party

1 may file a motion to extend the time for filing a brief so long as it complied with that rule and NRAP

2 27. In compliance with NRAP 31(3)(A) Appellants state the following:

3 **a. Date Briefs Are Due.**

4 July 24, 2015.

5 **b. Number of Extensions Previously Requested.**

6 No extensions have been requested.

7 **c. Have Any Previous Requests for Extension Have Been Denied.**

8 No prior requests for extension has been denied.

9 **d. The Reasons and Grounds For Extension.**

10 Please see above Brief Statement of Facts and McDonald Declaration attached herein as Exhibit

11 1.

12 **e. The Length of the Extension Requested.**

13 Appellants request that the briefing schedule be extended an additional 90 days.

14 **III.**

15 **CONCLUSION**

16 Wherefore based on the foregoing, Appellants request that the briefing schedule be continued
17 90 days.

18 DATED this 23rd day of July, 2015.

19 **McDONALD LAW OFFICES, PLLC**

20
21 By: /s/ Brandon B. McDonald
22 Brandon B. McDonald, Esq.
23 Nevada Bar No.: 11206
24 2505 Anthem Village Drive, Ste. E-474
25 Henderson, NV 89052
26 Attorneys for Appellants
27

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRAP 25, I hereby certify that on this 23rd day of July, 2015, service of the
3 foregoing **APPELLANTS' MOTION TO EXTEND BRIEFING SCHEDULE (First Request)** was
4 made by submission of the same to the Nevada Supreme Court electronic filing system to the parties
5 identified below, through their respective registration and service profile:
6

7 Samuel L. Lionel, Esq.

8 Brandon B. McDonald, Esq.

9
10 /s/ Eric Tucker
11 An employee of McDonald Law Offices, PLLC
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EXHIBIT 1

**DECLARATION OF BRANDON B. McDONALD, ESQ. IN
SUPPORT OF MOTION TO EXTEND BRIEFING SCHEDULE**

Brandon B. McDonald, Esq. declares as follows:

1. I am the counsel of record for the Appellants in this matter. I am duly licensed to practice in the State of Nevada. I make this Declaration in support of the foregoing Motion to Extend Briefing Schedule.

2. Appellants need additional time to submit an appeal.

3. Appellants are traveling, making meaningful communication with the clients difficult. The firm's staff is also dealing with sensitive family issues which require their immediate attention. Appellants have also tendered a settlement offer and would like to obtain a response, which may render the appeal moot.

4. Appellants believe that an extension of 90 days will be ample time to properly brief this matter and coordinate with respondents.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated this 23rd day of July, 2015.

/s/ Brandon B. McDonald
BRANDON B. McDONALD, ESQ.