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Oct 21 2015 09:30 a.m.
Tracie K. Lindeman
Clerk of Supreme Court

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

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

11 Appellants,

13 v.

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

17 Respondents.

19 _____
20 AND ALL RELATED MATTERS

Case No. 67595

District Court Case No.: A-686303

21 **APPELLANTS' MOTION TO EXTEND BRIEFING SCHEDULE**
22 **(Second Request)**

22 Appellants, by and through their counsel of record, Brandon B. McDonald, Esq. of McDonald
23 Law Offices, PLLC hereby files this Motion to Extend Briefing Schedule. Appellants need additional
24 time to submit an appeal. Appellants are in the process of obtaining substitute counsel and would like
25 the anticipated counsel to carry on with the case. This matter has been subject to one prior request for
26 extension.
27

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

3 **MEMORANDUM OF POINTS AND AUTHORITIES**

4 **I.**

5 **BRIEF STATEMENT OF FACTS**

6 Appellants need additional time to submit an appeal. Declaration of Brandon McDonald
7 (“McDonald Declaration”), attached herein as Exhibit 1 at ¶2. Counsel for Appellants intends to
8 withdraw and Appellants are in the process of obtaining substitute counsel. Counsel believes that the
9 new counsel will need time to familiarize themselves with this matter, in order to prepare the brief and
10 appendices required in this matter. McDonald Declaration at ¶3. Appellants believe that an extension of
11 60-90 days will be ample time to properly brief this matter and coordinate with respondents. *Id.* at ¶4.
12

13 **II.**

14 **LEGAL ARGUMENT**

15 **A. THE BRIEFING SCHEDULE SHOULD BE EXTENDED TO ALLOW APPELLANTS**
16 **ADEQUATE TIME TO BRIEF THIS MATTER AND OBTAIN NEW COUNSEL.**

17 The briefing schedule should be continued to allow the Appellant adequate time to brief this
18 matter and obtain new counsel. *See generally* McDonald Declaration. Therefore, Appellants request an
19 extension of the briefing schedule for at least 60-90 days to allow time to act without unnecessary haste.
20

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

23 The briefing schedule of the appeals should be extended. Pursuant to NRAP 31(3)(A), a party
24 may file a motion to extend the time for filing a brief so long as it complied with that rule and NRAP 27.
25 In compliance with NRAP 31(3)(A) Appellants state the following:

26 **a. Date Briefs Are Due.**

October 22, 2015.

b. Number of Extensions Previously Requested.

One extension has been requested.

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

No prior requests for extension has been denied.

d. The Reasons and Grounds For Extension.

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

1.

e. The Length of the Extension Requested.

Appellants request that the briefing schedule be extended an additional 60-90 days.

III.

CONCLUSION

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

DATED this 20th day of October, 2015.

McDONALD LAW OFFICES, PLLC

By: /s/ Brandon B. McDonald
Brandon B. McDonald, Esq.
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2505 Anthem Village Drive, Ste. E-474
Henderson, NV 89052
Attorneys for Appellants

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CERTIFICATE OF SERVICE

Pursuant to NRAP 25, I hereby certify that on this 20th day of October, 2015, service of the foregoing **APPELLANTS' MOTION TO EXTEND BRIEFING SCHEDULE (Second Request)** was made by submission of the same to the Nevada Supreme Court electronic filing system to the parties identified below, through their respective registration and service profile:

Samuel L. Lionel, Esq.

Brandon B. McDonald, Esq.

/s/ Eric Tucker
An employee of McDonald Law Offices, PLLC

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. I intend to withdraw and Appellants are in the process of obtaining substitute counsel. The new counsel will need time to familiarize themselves with this matter, in order to prepare the brief and appendices required.

4. An extension of 60-90 days will be ample time to properly brief this matter and coordinate with respondents. *Id.* at ¶4.

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

Dated this 20th day of October, 2015.

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