

1 FENNEMORE CRAIG  
2 Samuel S. Lionel (Bar No. 1766)  
3 1400 Bank of America Plaza  
4 300 South Fourth Street  
5 Las Vegas, Nevada 89101  
6 Telephone: (702) 692-8000  
7 Facsimile: (702) 692-8099  
8 Email: slionel@fclaw.com

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

Electronically Filed  
Oct 23 2015 10:10 a.m.  
Tracie K. Lindeman  
Clerk of Supreme Court

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

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

14 Appellants,

15 v.

16 SIG ROGICH aka SIGMUND  
17 ROGICH as Trustee of THE ROGICH  
18 FAMILY IRREVOCABLE TRUST,  
19 ELDORADO HILLS, LLC, a Nevada  
limited liability company; DOES 1-X;  
and/or ROE CORPORATIONS I-X,  
inclusive,

20 Respondents.

Case No.: 67595

District Court Case No: A-13-686303-C

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

21 **OPPOSITION TO MOTION TO EXTEND BRIEFING SCHEDULE**  
22 **THE MOTION SHOULD BE DENIED**

23 On June 26, 2015, the Court entered an Order Dismissing Appeal In Part  
24 which dismissed the appeal from an order granting summary judgment and  
25 permitted the appeal to proceed "as to the orders awarding attorney fees and costs."  
26 2015-19597 at 3.

27 On July 23, 2015, Appellants filed a Motion to Extend Briefing Schedule  
28

1 First Request) on the grounds that Appellants “need additional time to submit an  
2 appeal, due to the inability to communicate with the clients, issues with available  
3 firm staff, etc.” and “Appellants have also tendered a settlement offer and would  
4 like to explore that possibility rather than compelling the parties to carry through  
5 with the appellate process.” Appellants requested a 90 day extension. 2015- 22340  
6 at 1:23-27. Respondent, the Rogich Family Irrevocable Trust, did not object to  
7 Appellants’ motion.

8 On August 14, 2015, the Court entered an Order Granting Motion which  
9 extended Appellants time to file and serving its opening brief and appendix until  
10 October 22, 2015. The Order provided that “[g]iven the length of the initial  
11 extension request, no further extensions shall be permitted absent extraordinary  
12 circumstances and extreme need. NRAP 31(b)(3)(B).” 2015-24654.

13 Appellants present motion was filed on October 21, 2015. It states that  
14 “Appellants need additional time to submit an appeal. Appellants are in the process  
15 of obtaining substitute counsel and would like the anticipated counsel to carry on  
16 with the case.” It further states that “Counsel for Appellants intends to withdraw  
17 and Appellants are in the process of obtaining substitute counsel.” 2015-32023 at  
18 1:23-26, 2:7,8.

### 19 CONCLUSION

20 As there has been no showing of extraordinary circumstances and extreme  
21 need for granting Appellants an additional extension of time, the motion should be  
22 denied. NRAP 31(b)(3)(B), Order Granting Motion 2015-24654.

23 **FENNEMORE CRAIG**

24 By   
25 Samuel S. Lionel, Esq.

26 Nevada Bar No. 1766  
27 300 South Fourth St., #1400  
28 Las Vegas. NV 89101  
*Attorney for Respondent*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

## CERTIFICATE OF SERVICE

Pursuant to Nevada Rule of Appellate Procedure 25 (c)(1), I hereby certify that I am an employee of FENNEMORE CRAIG and that on this 23<sup>rd</sup> day of October 2015, I caused the **OPPOSITION TO APPELLANTS' MOTION TO EXTEND BRIEFING SCHEDULE** to be served by submission to the electronic filing service for the Nevada Supreme Court upon the following to the email addresses on file and by depositing same for mailing in the United States Mail, in a sealed envelope addressed to:

[brandon@mcdonaldlawyers.com](mailto:brandon@mcdonaldlawyers.com)

Brandon McDonald, Esq.  
McDonald Law Offices, PLLC  
2505 Anthem Village Drive  
Suite E-474  
Henderson, NV 89052

  
An employee of Fennemore Craig

10966441