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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,

Appellants,

v.

SIG ROGICH aka 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 I-X,
inclusive,

Respondents.

Case No.: 67595

District Court Case No. 2015-003-C

Dept. No.: XXVII

Electronically Filed
Dec 15 2015 01:18 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

**MOTION FOR EXTENSION OF
TIME FOR RESPONDENT TO
FILE ANSWERING BRIEF**

(First Request)

**MOTION FOR EXTENSION OF TIME FOR RESPONDENT TO FILE
ANSWERING BRIEF**

Respondent Sigmund Rogich moves the Court for an Order extending
Respondent's time to file the Answering Brief herein on the ground that the
Respondent's attorney will not have the time to complete the brief. There has
been no prior extension or request for extension and Appellants' attorney has been
unwilling to stipulate to an extension.

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1 This Motion is made and based on the Declaration of Samuel S. Lionel,
2 attached hereto as Exhibit A.

3 FENNEMORE CRAIG

4
5 by: 
6 Samuel S. Lionel, Nevada Bar. No. 1766
7 slionel@fclaw.com
8 300 South Fourth Street, 14th Floor
9 Las Vegas, NV 89101
10 Telephone: 702-692-8000
11 Facsimile: 702-692-8099

12 *Attorneys for Respondent*

13 **POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR**
14 **EXTENSION OF TIME FOR RESPONDENT TO FILE ANSWERING**
15 **BRIEF**

16 NRAP 31(b)(2) provides for a stipulation for a first extension for filing any
17 brief. As shown by the attached Declaration, Appellants' attorney is not willing to
18 grant the requested extension.

19 Respondent was served with Appellants' Opening Brief on November 23,
20 2015. Respondent's Brief is due on December 23, 2015. Respondent's attorney is
21 leaving Las Vegas on December 18th for a 15 day cruise and needs a 30 day
22 extension to January 22, 2016 to complete the Answering Brief.

23 //

24 //

25 //

1 CONCLUSION

2 An extension of time to file Respondent's Answering Brief until January 22,
3 2016 is respectfully requested.
4

5
6 FENNEMORE CRAIG

7 by: 

8 Samuel S. Lionel, Nevada Bar. No. 1766

9 slionel@fclaw.com

10 300 South Fourth Street, 14th Floor

11 Las Vegas, NV 89101

12 Telephone: 702-692-8000

13 Facsimile: 702-692-8099

14 *Attorneys for Respondent*
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1 **CERTIFICATE OF SERVICE**

2 Pursuant to Nevada Rule of Appellate Procedure 25 (c)(1), I hereby certify that
3 I am an employee of FENNEMORE CRAIG and that on this 15th day of
4 December 2015, I caused the foregoing **MOTION FOR EXTENSION OF**
5 **TIME FOR RESPONDENT TO FILE ANSWERING BRIEF** to be served by
6 submission to the electronic filing service for the Nevada Supreme Court upon the
7 following to the email addresses on file and by depositing same for mailing in the
8 United States Mail, in a sealed envelope addressed to:

9 brandon@mcdonaldlawyers.com

10 Brandon McDonald, Esq.
11 McDonald Law Offices, PLLC
12 2505 Anthem Village Drive
Suite E-474
Henderson, NV 89052


13 
14 An employee of Fennemore Craig

EXHIBIT A

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Samuel S .Lionel

EXHIBIT 1

FARNHAM, DENISE

From: SLIONEL@FCLAW.com
Sent: Friday, December 11, 2015 4:20 PM
To: Brandon McDonald
Subject: Huerta Appeal [FC-Email.FID6591192]
Attachments: Stipulation to Extend Time to File Answering Brief.doc

Brandon,

I have tried 3 times to reach you by phone without success.

The Answering Brief in the Huerta appeal is due on December 21. I am leaving on a 15 day cruise the night of December 18. I have another brief I am working on which won't be completed until shortly before I leave. It is due on December 23. I am unable to complete the Answering Brief before leaving.

I am attaching a Stipulation giving me 30 additional days to file the Answering Brief and request that you sign and e-mail it to me. If for any reason you are unwilling to do so, please let me know ASAP and I will file a motion.

Sam

Samuel S. Lionel/Director | Fennemore Craig, P.C.
300 S. Fourth Street, Suite 1400, LV, NV 89101
Tel: 702.791.8251 Fax: 702.791.8252

FENNEMORE CRAIG
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1400 Bank of America Plaza
300 South Fourth Street
Las Vegas, Nevada 89101
Telephone: (702) 692-8000
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Email: slionel@fclaw.com

Attorneys for Respondent

**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
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ROGICH as Trustee of THE ROGICH
FAMILY IRREVOCABLE TRUST;
ELDORADO HILLS, LLC, a Nevada
limited liability company; DOES 1-X;
and/or ROE CORPORATIONS I-X,
inclusive,

Respondents.

Case No.: 67595

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

Dept. No.: XXVII

**STIPULATION OF EXTENSION
OF TIME FOR RESPONDENT TO
FILE ANSWERING BRIEF**

(First Request)

**STIPULATION OF EXTENSION OF TIME FOR RESPONDENT TO FILE
ANSWERING BRIEF**

It is stipulated that the time for the filing of Respondent's Answering Brief is
extended to January 20, 2016. The Brief is now due on December 21, 2015. There

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1 have been no prior requests for extension.

2 Dated this 11th day of December, 2015.

3
4 **McDONALD LAW OFFICES, PLLC**

FENNEMORE CRAIG

5
6 By _____
7 Brandon B. McDonald, Esq.
8 Nevada Bar No. 11206
9 2505 Anthem Village Dr. St, E-474
10 Henderson, NV 89052
11 *Attorney for Appellants*

By _____
Samuel S. Lionel, Esq.
Nevada Bar No. 1766
300 South Fourth St, #1400
Las Vegas, NV 89101
Attorney for Respondent