1	IN THE SUPREME COURT OF THE	
2	STATE OF NEVADA	
3		Electronically Filed
4	CARLOS A. HUERTA, an individual, CARLOS A. HUERTA as Trustee of	Case No.: 675 Electronically Filed Dec 15 2015 01:18 p.m.
5	THE ALEXANDER CHRISTOPHER TRUST, a Trust established in Nevada	District Court date index and Clerk of Supreme Court
6	as assignee of interests of GO GLOBAL, INC., a Nevada corporation,	Dept. No.: XXVII
7	Appellants,	MOTION FOR EXTENSION OF TIME FOR RESPONDENT TO
8	v.	FILE ANSWERING BRIEF
10	SIG ROGICH aka SIGMUND ROGICH as Trustee of THE ROGICH	(First Request)
10	FAMILY IRREVOCABLE TRUST; ELDORADO HILLS LLC a Nevada	
11	limited liability company; DOES 1-X; and/or ROE CORPORATIONS I-X,	
13	inclusive,	
14	Respondents.	
15		
16	MOTION FOR EXTENSION OF 1	IME FOR RESPONDENT TO FILE
17	ANSWERING BRIEF	
18	Respondent Sigmund Rogich moves the Court for an Order extending	
	Respondent's time to file the Answering Brief herein on the ground that the	
19	Respondent's time to file the Answering I	
19 20	-	Brief herein on the ground that the
	Respondent's time to file the Answering I Respondent's attorney will not have the ti	Brief herein on the ground that the
20	-	Brief herein on the ground that the me to complete the brief. There has
20 21	Respondent's attorney will not have the ti	Brief herein on the ground that the me to complete the brief. There has
20 21 22 23 24	Respondent's attorney will not have the ti been no prior extension or request for extension unwilling to stipulate to an extension.	Brief herein on the ground that the me to complete the brief. There has
20 21 22 23 24 25	Respondent's attorney will not have the ti been no prior extension or request for extension	Brief herein on the ground that the me to complete the brief. There has
20 21 22 23 24 25 26	Respondent's attorney will not have the ti been no prior extension or request for extension unwilling to stipulate to an extension.	Brief herein on the ground that the me to complete the brief. There has
20 21 22 23 24 25 26 27	Respondent's attorney will not have the ti been no prior extension or request for exten unwilling to stipulate to an extension.	Brief herein on the ground that the me to complete the brief. There has
20 21 22 23 24 25 26	Respondent's attorney will not have the ti been no prior extension or request for extension unwilling to stipulate to an extension.	Brief herein on the ground that the me to complete the brief. There has

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: PLione		
6 7	Samuel S, Lionel, Nevada Bar. No. 1766 slionel@fclaw.com		
8	300 South Fourth Street, 14 <sup>th</sup> Floor Las Vegas, NV 89101 Telephone: 702-692-8000		
9	Facsimile: 702-692-8099		
10	Attorneys for Respondent		
11	DODITE AND A UTHODITIES IN SUDDODT OF MOTION FOD		
12	POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR		
13	EXTENSION OF TIME FOR RESPONDENT TO FILE ANSWERING BRIEF		
14			
15	NRAP 31(b)(2) provides for a stipulation for a first extension for filing any		
16	brief. As shown by the attached Declaration, Appellants' attorney is not willing to		
17 18	grant the requested extension.		
18			
20	Respondent was served with Appellants' Opening Brief on November 23,		
21	2015. Respondent's Brief is due on December 23, 2015. Respondent's attorney is		
22	leaving Las Vegas on December 18th for a 15 day cruise and needs a 30 day		
23	extension to January 22, 2016 to complete the Answering Brief.		
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27	11		
28 Fennemore Craig			
JONES VARGAS Las Veons	2		

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1	CONCLUSION
2	An extension of time to file Respondent's Answering Brief until January 22,
3	2016 is respectfully requested.
4	2010 is respectivity requester.
5	
6	FENNEMORE CRAIG
7 8	by Stippel
8 9	Samuel S, Lionel, Nevada Bar. No. 1766
9 10	Saintier S, Eloner, Nevada Bar. No. 1700 slionel@fclaw.com 300 South Fourth Street, 14 <sup>th</sup> Floor Las Vegas, NV 89101 Telephone: 702-692-8000 Facsimile: 702-692-8099
10	Telephone: 702-692-8000 Facsimile: 702-692-8099
12	Attorneys for Respondent
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FENNEMORE CRAIG JONES VARGAS LAS VEGAS	
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1	CERTIFICATE OF SERVICE		
2	Pursuant to Nevada Rule of Appellate Procedure 25 (c)(1), I hereby certify that		
2	I am an employee of FENNEMORE CRAIG and that on this15th 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. McDonald Law Offices, PLLC		
11	2505 Anthem Village Drive		
12	Suite E-474 Henderson, NV 89052		
13	Kluin Handern		
14	An employee of Fennemore Craig		
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FENNEMORE CRAIG JONES VARGAS Las Vegas			

## EXHIBITA

1	DECLARATION OF SAMUEL S. LIONEL	
2	I, Samuel S. Lionel, declare that I am an attorney at law and duly licensed to	
3	practice in Nevada and I have personal knowledge of facts set forth in this	
4	Declaration and I am competent to testify to the matters stated herein.	
5	1. I am the attorney for the Respondent, Sigmund Rogich, as Trustee of	
6	the Rogich Family Irrevocable Trust and have represented him in the litigation	
7	since its commencement.	
8	2. The Opening Brief was served on November 23, 2015 and the	
9	Answering Brief is currently due on December 23 2015.	
10	3. On December 18, 2015, my wife, my stepson, his classmate and I are	
11	leaving on a 15 day cruise through the Panama Canal.	
12	4. I have been working on the Answering Brief, but it is not completed. I	
13	have been also working on completing another brief ordered to be filed by	
14	December 23, 2015, but as I have no extension it will have to be completed before I	
15	leave.	
16	5. I have made several attempts to reach Appellants' attorney to obtain a	
17	stipulation for an extension, but he apparently is unwilling to stipulate. Attached as	
18	Exhibit I is an email showing my attempt.	
19	I, Samuel S, Lionel, declare under penalty of perjury that the foregoing is	
20	true and correct.	
21	Executed on December <u>15</u> , 2015.	
22	1 & Find	
23	Samuel S .Lionel	
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27		
28 Fennemore Craig	11134555	
Las Vegas		

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## **E X H I B I T 1**

## FARNHAM, DENISE

From: Sent: To: Subject: Attachments: SLIONEL@FCLAW.com Friday, December 11, 2015 4:20 PM Brandon McDonald Huerta Appeal [FC-Email.FID6591192] 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

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

1	FENNEMORE CRAIG Samuel S. Lionel (Bar No. 1766)		
2	1400 Bank of America Plaza 300 South Fourth Street		
3	Las Vegas, Nevada 89101		
4	Telephone: (702) 692-8000 Facsimile: (702) 692-8099 Email: slionel@fclaw.com		
5	Attorneys for Respondent		
6	IN THE SUPREME COURT OF THE		
7		F NEVADA	
8			
9	CARLOS A. HUERTA, an individual, CARLOS A. HUERTA as Trustee of	Case No.: 67595	
10	THE ALEXANDER CHRISTOPHER TRUST, a Trust established in Nevada	District Court Case No: A-13-686303-C	
11	as assignee of interests of GO GLOBAL, INC., a Nevada corporation,	Dept. No.: XXVII	
12	Appellants,		
13	V.	STIPULATION OF EXTENSION	
14	SIG ROGICH aka SIGMUND	OF TIME FOR RESPONDENT TO FILE ANSWERING BRIEF	
15	ROGICH as Trustee of THE ROGICH FAMILY IRREVOCABLE TRUST;	(First Request)	
16	ELDORADO HILLS, LLC, a Nevada limited liability company; DOES 1-X; and/or ROE CORPORATIONS I-X,		
17	and/or ROE CORPORATIONS I-X, inclusive,		
18	Respondents.		
19			
20	<b>STIDUL ATION OF FYTENSION OF</b>	TIME FOR RESPONDENT TO FILE	
21		ING BRIEF	
22	It is stipulated that the time for the	filing of Respondent's Answering Brief is	
23	-	It is stipulated that the time for the filing of Respondent's Answering Brief is	
24	extended to January 20, 2016. The Brief is now due on December 21, 2015. There		
25	//		
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FENNEMORE CRAIG			
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1	have been no prior requests for extension.	
2	Dated this 11 <sup>th</sup> day of December, 2015.	
3	Dated this 11 day of December, 2015.	
4	McDONALD LAW OFFICES, PLLC	FENNEMORE CRAIG
5		D
6	By Brandon B. McDonald, Esq.	By Samuel S. Lionel, Esq.
7	Nevada Bar No. 11206	Nevada Bar No. 1766
8	2505 Anthem Village Dr. St, E-474 Henderson, NV 89052	300 South Fourth St, #1400 Las Vegas. NV 89101
9	Attorney for Appellants	Attorney for Respondent
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FENNEMORE CRAIG JONES VARGAS Las Vegas	2	

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