

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

2 MATT KLABACKA,
3 DISTRIBUTION TRUSTEE OF
4 THE ERIC L. NELSON NEVADA
 TRUST DATED MAY 30, 2001,

5 Appellant/Cross-Respondent,

6 and

7 LYNITA SUE NELSON,
8 INDIVIDUALLY, AND IN HER
9 CAPACITY AS INVESTMENT
10 TRUSTEE OF THE LSN NEVADA
11 TRUST DATED MAY 30, 2001,
12 AND ERIC L. NELSON,
13 INDIVIDUALLY,
14 AND IN HIS CAPACITY AS
15 INVESTMENT TRUSTEE OF THE
16 ERIC L. NELSON NEVADA
17 TRUST DATED MAY 30, 2001,

18 Respondents/Cross-Appellants.

SUPREME COURT CASE NO. 66772
Consolidated Case No. 68292
Electronically Filed
Apr 05 2016 08:40 a.m.
Tracie K. Lindeman
Clerk of Supreme Court

19 STIPULATION AND JOINT REQUEST/MOTION
20 REGARDING REMAINING BRIEFING SCHEDULE

21 COMES NOW, Respondent/Cross-Appellant, LYNITA SUE NELSON
22 (“Lynita”), by and through her attorneys, ROBERT P. DICKERSON, ESQ.,
23 KATHERINE L. PROVOST, ESQ., and JOSEF M. KARACSONYI, ESQ., of THE
24 DICKERSON LAW GROUP, Respondent/Cross-Appellant, ERIC NELSON, by and
25 through his attorney, RHONDA K. FORSBERG, ESQ., of the law firm of RHONDA
26 K. FORSBERG CHARTERED, and Appellant/Cross-Respondent, MATT
27 KLABACKA, as Distribution Trustee of the Eric L. Nelson Nevada Trust dated May
28 30, 2001 (“ELN Trust”), by and through his attorneys, MARK A. SOLOMON, ESQ.,
 and JEFFREY P. LUSZECK, ESQ., of the law firm of SOLOMON DWIGGINS &
 FREER, LTD., and pursuant to NRAP 31(b)(2), stipulate and jointly request and
 move the Court for the following relief:

29 ...

1 On November 30, 2015, ELN Trust filed its Opening Brief. On March 1, 2016,
2 Eric and Lynita each filed an Answering Brief and Opening Brief on Cross-Appeal.

3 Pursuant to the Court's February 8, 2016 Order, entered pursuant to stipulation
4 of the parties, ELN Trust is required to file a combined reply brief on appeal and
5 answering brief on cross-appeal by April 15, 2016. Eric's Opening Brief on Cross-
6 Appeal raises issues which are adverse to Lynita and her position on appeal.
7 Therefore, the parties agree that both ELN Trust and Lynita shall have the right to
8 respond to Eric's Opening Brief on Cross-Appeal if they choose. Specifically, the
9 parties stipulate and request that the Court approve the following remaining briefing
10 schedule:

11 ...
12 ...
13 ...
14 ...
15 ...
16 ...
17 ...
18 ...
19 ...
20 ...
21 ...
22 ...
23 ...
24 ...
25 ...
26 ...
27 ...
28 ...

1 (1) May 3, 2016 – ELN Trust shall file its combined reply brief on appeal
2 and answering brief on cross-appeal to Lynita’s Opening Brief on Cross-Appeal, and
3 if it so chooses, to Eric’s Opening Brief on Cross-Appeal, and Lynita shall file her
4 answering brief to Eric’s Opening Brief on Cross-Appeal.

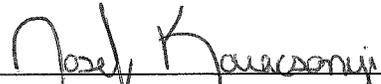
5 (2) June 3, 2016 – Lynita and Eric shall file their respective reply briefs on
6 cross-appeal.

7 DATED this 15th day of March, 2016.

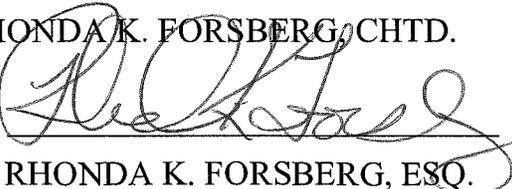
8 THE DICKERSON LAW GROUP

RHONDA K. FORSBERG, CHTD.

9
10 By



By

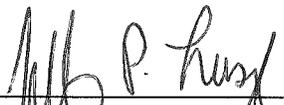


11 ROBERT P. DICKERSON, ESQ.
12 Nevada Bar No. 000945
13 KATHERINE L. PROVOST, ESQ.
14 Nevada Bar No. 008414
15 JOSEF M. KARACSONYI, ESQ.
16 Nevada Bar No. 010634
17 1745 Village Center Circle
18 Las Vegas, Nevada 89134
19 Attorneys for Respondent/Cross-
20 Appellant, Lynita Sue Nelson

21 RHONDA K. FORSBERG, ESQ.
22 Nevada Bar No. 009557
23 64 N. Pecos Road #800
24 Henderson, Nevada 89074
25 Attorneys for Respondent/Cross-
26 Appellant, Eric Nelson

27 SOLOMON DWIGGINS & FREER, LTD.

28
By



29 MARK A. SOLOMON, ESQ.
30 Nevada Bar No. 000418
31 JEFFREY P. LUSZECK, ESQ.
32 Nevada Bar No. 009619
33 9060 W. Cheyenne Avenue
34 Las Vegas, Nevada 89129
35 Attorneys for Appellant/Cross-
36 Respondent, Matt Klabacka

