

1 **ROBERT NOGGLE, ESQ.**

Nevada Bar No. 11427

2 **ALEX GHIBAUDO, ESQ.**

3 Nevada Bar No. 10592

NOGGLE LAW

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8 *Attorneys for Appellant*

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Tracie K. Lindeman
Clerk of Supreme Court

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

10 *****

11 KENNETH RENFROE,

) Supreme Court No.: 68907

) District Court No.: A-14-700520-C

12 Appellant,

)

)

13 vs.

)

)

14 LAKEVIEW LOAN SERVICE LLC.,)

)

)

15 Respondent.

)

16)

17 **MOTION TO EXTEND TIME TO FILE A SUPPLEMENTAL RESPONSE**

18 COMES NOW, Kenneth Renfroe ("Appellant"), through his attorney Alex
19 Ghibaudonogglelaw.com, and files his motion to extend time to file his
20 second supplemental response.
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24 **POINTS AND AUTHORITIES**

25 This Court has suspended briefing in the above entitled matter because, at
26 the time of filing, not all the parties to the matter were dismissed from the case.
27 Specifically, Brian Ferguson and Jennifer Ferguson. As such, the Court issued an
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1 Order to Show Cause why the appeal should not be dismissed. In response,
2 undersigned counsel indicated, as suggested by this court, that entry of default
3 judgment would be forthcoming. Since then, a "prove-up" hearing was held and
4 default judgment was entered against Brian and Jennifer Ferguson. An order was
5 drafted and subsequently sent to Department III in the Eighth Judicial District
6 Court.
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9 Since then, the order entering default judgment against Brian Ferguson and
10 Jennifer Ferguson has been entered, filed, and a notice of entry of order sent to all
11 relevant parties. Regrettably, the notice sent by the Court on the 12th of April
12 requiring an update within 5 days was miscalendared. As such, Appellant's
13 supplemental response is now late. Under NRAP 2, this court may suspend its
14 own rules or the Nevada Rules of Appellate Procedure where it is expedient to do
15 so. Here, should the matter be dismissed due to a calendaring error it would work
16 a manifest injustice upon the appellant, whose property is on the line.
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20 A more appropriate sanction would be to compel Noggle Law to contribute
21 an appropriate sum to the Nevada Law Library. As such, Appellant prays this
22 court accepts its supplemental response and imposes a monetary sanction upon
23 Noggle Law as appropriate under the circumstances and allow the appeal to
24 proceed forthwith.
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27 The supplemental response is filed separately from this request.
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1
2 DATED this 23rd day of April, 2016.

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4 **NOGGLE LAW**

5
6 /s/ Alex Ghibaudo

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8 **ALEX GHIBAUDO, ESQ.**

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17 **CERTIFICATE OF SERVICE**

18 Pursuant to NRAP 25, on April 23rd, 2016 the MOTION FOR
19 EXTENSION OF TIME was served upon each of the parties to appeal 68907 via
20 electronic service through the Supreme Court of Nevada's electronic filing.

21
22 /s/ Alex Ghibaudo, Esq.

23
24 An Employee of NOGGLE LAW, PLLC