

IN THE SUPREME COURT OF THE STATE OF NEVADA

FREDRIC AND BARBARA
ROSENBERG LIVING TRUST,

Appellant,

vs.

BANK OF AMERICA, N.A.; BAC
HOME LOANS SERVICING, LP, a
foreign limited partnership;
MACDONALD HIGHLANDS
REALTY, LLC, a Nevada limited
liability company; MICHAEL
DOIRON, an individual; SHAHIN
SHANE MALEK, an individual; PAUL
BYKOWSKI, an individual; THE
FOOTHILLS AT MACDONALD
RANCH MASTER ASSOCIATION, a
Nevada limited liability company; THE
FOOTHILLS PARTNERS, a Nevada
limited partnership;

Respondents.

Case No. 69399

District Court Case No: A-15-089113-C
Electronically Filed
May 26 2016 11:49 a.m.

Tracie K. Lindeman

Clerk of Supreme Court

**UNOPPOSED MOTION TO EXTEND
TIME TO FILE APPELLANT'S
OPENING BRIEF AND APPENDIX
(Second Request)**

Appellant Fredric and Barbara Rosenberg Living Trust ("Trust"), pursuant to NRAP 26(b)(1)(A) hereby requests an additional thirty (30) days, until June 27, 2016, to file its opening brief and appendix. This is the second request for extension of time for this brief. The brief is currently due on May 27, 2016 pursuant to a stipulation and order entered by the Court on April 26, 2016. Undersigned counsel has spoken with Matthew Carter, counsel for respondents MacDonald Highland Realty, LLC ("MHR"), Michael Doiron ("Doiron"), and FHP Ventures (wrongfully named as The Foothills Partners) ("FHP") (together MHR, Doiron, and FHP, the "Respondents"), who has authorized the Trust to represent Respondents do not oppose this extension of time.

Counsel with primary responsibility for the brief recently left the firm and

moved to another state, necessitating the need to reassign the brief. Additionally, another notice of appeal was filed in the district court related to this case and it is anticipated that the parties will move to consolidate the appeals due to a potentially overlapping issue. Undersigned counsel has not yet been notified that the notice of appeal has been docketed at this Court at the time of the filing of this Unopposed Motion. This request is not made for purposes of delay or to prejudice any party.

This is the second request to extend time for this brief.

Dated this 26th day of May 2016.

KIM GILBERT EBRON

/s/Jacqueline A. Gilbert

HOWARD C. KIM, ESQ.

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CERTIFICATE OF SERVICE

I certify that on the 26th day of May, 2016, I filed the foregoing, completed **Unopposed Motion to Extend Time to File Appellant's Opening Brief and Appendix (Second Request) (Case No. 69399)** which shall be served via electronic service from the Court's eflex system to:

Master Service List

Docket Number and Case Title:	69399 - ROSENBERG LIVING TRUST VS. MACDONALD HIGHLANDS LLC
Case Category	Civil Appeal
Information current as of:	May 26 2016 11:33 a.m.

Electronic notification will be sent to the following:

J. Jones
Matthew Carter
Spencer Gunnerson

Dated this 26th day of May 2016.

/s/Jacqueline A. Gilbert
An employee of Kim Gilbert Ebron