

IN THE SUPREME COURT OF THE STATE OF NEVADA

FREDERIC AND BARBARA
ROSENBERG LIVING TRUST,

Appellant/Cross-Respondent,

vs.

MACDONALD HIGHLANDS
REALTY, LLC, a Nevada Limited
Liability Company; MICHAEL
DOIRON, an Individual; and FHP
VENTURES, a Nevada Limited
Partnership,

Respondent/Cross-Appellants.

Case No. 69399

c/w Case No. 70478 Electronically Filed
Feb 15 2017 02:19 p.m.
District Court Case No. A-13-08913-A. Brown
Elizabeth A. Brown
Clerk of Supreme Court

**UNOPPOSED MOTION TO EXTEND
TIME TO FILE APPELLANT'S REPLY
BRIEF AND ANSWERING BRIEF ON
CROSS-APPEAL
(SECOND REQUEST)**

FREDERIC AND BARBARA
ROSENBERG LIVING TRUST,

Appellant,

vs.

SHAHIN SHANE MALEK,

Respondent.

Appellant/Cross-respondent The Frederic and Barbara Rosenberg Living Trust (the "Trust"), hereby requests an additional thirty (32) days, until March 20, 2017,¹ in which to file its reply brief/answering brief on cross-appeal. NRAP 41(b)(1). The brief is currently due on February 16, 2017 pursuant to a stipulation by the parties approved by this Court by order entered on January 12, 2017. This is the second request to extend time for this brief.

¹ Thirty days would fall on March 18, 2017 with the first court day following being March 20, 2017.

While the Trust has been diligently working on its brief, the attorney with primary responsibility for the brief went out early on maternity leave. Then, while working at home during the first extension of time, she developed pneumonia, which prevented her from finishing and finalizing the brief. Counsel is diligently working on the brief currently and the additional time will ensure the brief provides this Court with the necessary arguments to make a decision on these appeals.

Undersigned counsel has conferred with counsel for Respondent Shahin Shane Malek, and Respondent/Cross-Appellants MacDonald Highlands Realty, LLC, Michael Doiron, and FHP Ventures, LP, and had been authorized to represent these parties will not object to this extension of time.

This request is made in good faith and not for purposes of delay or prejudice to any party.

Dated: February 15, 2017

KIM GILBERT EBRON

/s/Jacqueline A. Gilbert

Jacqueline A. Gilbert, Esq.

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Fredrick and Barbara Rosenberg*

Certificate of Service

I hereby certify that this document was filed electronically with the Nevada Supreme Court on the 15th day of February, 2017. Electronic service of the foregoing **Unopposed Motion Stipulation to Extend Time to File Appellant's Reply Brief and Answering Brief on Cross-Appeal (Second Request)** shall be made in accordance with the Master Service List as follows:

Docket Number and Case Title: 69399 - ROSENBERG LIVING TRUST VS. MACDONALD HIGHLANDS REALTY, LLC C/W 70478
Case Category Civil Appeal
Information current as of: Jan 11 2017 02:53 p.m.

Electronic notification will be sent to the following:

J. Jones
Matthew Carter
Spencer Gunnerson

Docket Number and Case Title: 70478 - ROSENBERG LIVING TRUST VS. MALEK C/W 69399
Case Category Civil Appeal
Information current as of: Jan 11 2017 02:52 p.m.

Electronic notification will be sent to the following:

James Shapiro

Dated this 15th day of February, 2017.

/s/ Jacqueline A. Gilbert
an employee of KIM GILBERT EBRON