

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

ENRIQUE RODRIGUEZ, AN  
INDIVIDUAL,

Appellant,

vs.

FIESTA PALMS, LLC, A NEVADA  
LIMITED LIABILITY COMPANY,  
D/B/A PALMS CASINO RESORT,  
N/K/A FCH1, LLC, A NEVADA  
LIMITED LIABILITY COMPANY,

Respondent.

Case No.: 72098      Electronically Filed  
Jun 12 2017 04:01 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

Appeal from the Eighth Judicial District  
Court, the Honorable Joe Hardy  
Presiding

**MOTION FOR EXTENSION OF TIME TO FILE**  
**OPENING BRIEF AND APPENDIX**  
**(Second Request)**

**Marquis Aurbach Coffing**

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*Attorneys for Appellant,*

*Enrique Rodriguez*

Appellant, Enrique Rodriguez, by and through his counsel of record, Marquis Aurbach Coffing, hereby moves this Court pursuant to NRAP 31(b) for a 14-day extension of time to file his opening brief and appendix.

Rodriguez's opening brief and appendix were originally due on May 16, 2017. On May 16, 2017, this Court granted a 30-day extension of time, making Rodriguez's opening brief and appendix currently due on June 15, 2017. If this Court grants this request for a 14-day extension, Rodriguez's opening brief and appendix will be due on June 29, 2017. Good cause exists for allowing Rodriguez to extend the filing deadline until June 29, 2017:

1. Appellate counsel, Micah S. Echols, is scheduled for oral argument in three Nevada Supreme Court cases on June 14, 2017: *Mendenhall v. Tassinari* (Case No. 68053), *In re: The ATS 1998 Trust* (Case No. 67040), and *In re: The ATS 1998 Trust* (Case No. 68748). Preparation, attendance, and presentation of oral argument in these three cases has and will continue to require the full attention of Mr. Echols through June 14, which has caused a delay in the preparation of Rodriguez's opening brief and appendix.

2. In addition to his normal caseload, Mr. Echols was pulled into trial at the last minute in *Weingarten Nostat, Inc. v. Mr. D, LLC* (District Court Case No. A-15-721131-C) and has been heavily involved in post-trial briefing. He was also brought in immediately after trial in *Ryles v. Holloway* (District Court Case

No. A-14-702291-C) and has been heavily involved in post-trial briefing in this case as well. The demands of both of these cases have caused an unforeseen delay in the completion of the opening brief and appendix in the instant case.

3. Additionally, Mr. Echols' two-year-old daughter was required to have surgery on an urgent basis on May 30, 2017, and Mr. Echols was out of the office for a number of days during the surgery and critical recovery period, which caused an unforeseen delay in the preparation of Rodriguez's opening brief and appendix.

Therefore, Rodriguez respectfully requests that the deadline to file his opening brief and appendix be extended by 14 days to June 29, 2017. This motion is submitted in good faith and for good cause shown in accordance with NRAP 31(b).

Dated this 12th day of June, 2017.

MARQUIS AURBACH COFFING

By /s/ Micah S. Echols

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE OPENING BRIEF AND APPENDIX** was filed electronically with the Nevada Supreme Court on the 12th day of June, 2017. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Lew Brandon, Esq.  
Robert Eisenberg, Esq.

I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage prepaid, addressed to:

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/s/ Leah Dell \_\_\_\_\_  
Leah Dell, an employee of  
Marquis Aurbach Coffing