

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

Electronically Filed  
Jun 15 2018 10:33 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

In the Matter of the Estates of Thelma Ailene  
Sarge and Edwin John Sarge.

NO. 73286

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ESTATE OF THELMA AILENE SARGE;  
ESTATE OF EDWIN JOHN SARGE; AND BY  
AND THROUGH THE PROPOSED  
EXECUTRIX, JILL SARGE,

DISTRICT COURT NO.  
16 RP 000091B

Appellants,

vs.

QUALITY LOAN SERVICE CORPORATION;  
and ROSE HILL, LLC,

Respondents.

**MOTION FOR EXTENSION OF TIME TO FILE SUPPLEMENTAL BRIEF**

Appellants, by and through their undersigned counsel, Tory M. Pankopf (“Counsel”) move, pursuant to Rule 26(b)(1)(A) of the Nevada Rules of Appellate Procedure, this Court for an order permitting the filing of their supplemental brief (filed concurrently herewith) after June 7, 2018. The June 7, 2018, filing date was set by this Court’s May 30, 2018, order.

Based thereon, Counsel declares and states:

1. Appellants’ supplemental brief was due, June 7, 2018;
2. There has been one other extension requested;

3. Counsel did not contact opposing counsel re stipulation;
4. Counsel did not confirm whether opposing counsel would be agreeable to the extension;
5. Counsel who drafted Appellants' attached supplemental brief was, at the last minute, unexpectedly required to travel to Las Vegas in a federal case, Robert Slovak v Wells Fargo Bank, Case Number 3:13-cv-00569<sup>1</sup>, USDC, District of Nevada. Friday, last, counsel had filed an emergency motion to extend the time to have his client's expert witness conduct a forensic examination of documents to determine their authenticity. The last day to conduct the examination was June 8, 2018, or forever lose the opportunity to forensically exam the documents. While the motion was still pending on June 6, 2018, the expert witness was able to obtain the assistance of a colleague who would be available to conduct the forensic examination on June 8, 2018. Counsel confirmed with opposing counsel that the documents would be made available for inspection. Counsel withdrew the motion and made arrangements to fly to Las Vegas the next day, June 7, 2018, and meet with the expert and client's paralegal to prepare for the June 8, 2018, forensic examination.

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<sup>1</sup> Most of the court filed documents have been filed under seal.

As a consequence, counsel was unable to meet the court's June 7, 2018, deadline to file the supplemental brief (filed concurrently herewith) or file a motion for additional time. Counsel is a solo practitioner and had no one available who could either draft the supplemental brief or motion for extension of time;

6. Based thereon, Appellants respectfully request the court permit the filing of the supplemental brief (filed concurrently herewith) as of today, June 14, 2018.

Counsel declares under penalty of perjury under the laws of the state of Nevada the foregoing statements are true and correct.

**AFFIRMATION Pursuant to NRS 239B.030**

The undersigned does hereby affirm that this document does not contain the social security number of any person.

Dated: June 14, 2018

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