

SUPREME COURT OF THE STATE OF NEVADA

U.S. BANK NATIONAL ASSOCIATION ND, A
NATIONAL ASSOCIATION,

Appellant,

v.

RESOURCES GROUP, LLC, a Nevada limited
liability company,

Respondent.

Case No.: 74575

Electronically Filed
Jun 04 2018 02:42 p.m.
Elizabeth A. Brown
Clerk of Supreme Court
MOTION BY RESPONDENT FOR
FOUR-DAY EXTENSION TO FILE
ANSWERING BRIEF

MOTION BY RESPONDENT FOR FOUR-DAY EXTENSION TO FILE ANSWERING
BRIEF

Respondent Resources Group, LLC, by and through the undersigned counsel Richard Vilkin, hereby moves the court for a four-day extension to file the Answering Brief from today (June 4, 2018) to Friday, June 8, 2018. This is the second request for an extension to file the Answering Brief. Both counsel on this appeal filed a Stipulation for a 30-day extension for respondent to file the Answering Brief on April 30, 2018, which was granted by the court, extending the time to today, June 4, 2018.

The reason for the requested extension is twofold: the press of business and the size and scope of this appeal. With regard to the press of business, the undersigned filed an Opening Brief on Friday, June 1 in the appeal captioned *Saticoy Bay LLC Series 5029 Quail Bird v. Green Tree Servicing*, Appeal No. 74716. The undersigned also prepared and filed a Motion for Summary Judgment on June 1, 2018 in the case of *Savannah Falls Street Trust v. OneWest Bank*

1 (district court case A-13-683644-C) and is also filing an Opposition to Summary Judgment today
2 (June 4, 2018) in the case of *Saticoy Bay LLC 3608 Tundra Swan v. BAC Home Loans* (district
3 court case A-13-692060-C). The undersigned also has an Opposition to a Motion due in another
4 district court case today.
5

6 With regard to this appeal, the Appellant's Appendix is more than 2,000 pages and there
7 are a number of issues after a two-day bench trial. While the undersigned has done work on the
8 Answering Brief, it is just too much to get finished today. The undersigned is requesting four
9 additional days until Friday, June 8, 2018 to file the Answering Brief.
10

11 Counsel for appellant, Thomas Beckom, has no objection to the requested extension. See
12 Exhibit A hereto (emails to and from Mr. Beckom).

13 Date: June 4, 2018

GEISENDORF & VILKIN, PLLC

14 /s/ Richard J. Vilkin
15

16 By: _____
17 Richard J. Vilkin, Esq.
18 Nevada Bar 8301
19 2470 St. Rose Parkway, Suite 309
20 Henderson, Nevada 89074
21 *Attorneys for respondent Resources*
22 *Group, LLC*
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Dated this 4th day of June, 2018

Signature/Stacie Geisendorf, an employee of
Geisendorf & Vilkin, PLLC

EXHIBIT A

From: Thomas Beckom <tbeckom@McCarthyHolthus.com>
Sent: Monday, June 4, 2018 9:04 AM
To: richard@vilkinlaw.com
Subject: Re: from Vilkin re Rollingstone appeal 74575

Take as much time as you need Richard.

Sent from my iPhone

On Jun 4, 2018, at 8:54 AM, "richard@vilkinlaw.com" <richard@vilkinlaw.com> wrote:

Thomas, Mon. June 4

My Answering brief on this appeal is due today. Will you agree that I may have four additional days until this Friday, June 8 to file the Answering brief? If you agree, I will attach this email to my Motion, as I must obtain the additional time by Motion. Thanks.

Richard Vilkin

Richard Vilkin
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