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IN THE SUPREME COURT OF THE STATE OF NEVADA

ROBERT G. REYNOLDS, AN INDIVIDUAL;
AND DIAMANTI FINE JEWELERS, LLC, A
NEVADA LIMITED LIABILITY COMPANY,

Appellants,

vs.

RAFFI TUFENKJIAN, AN INDIVIDUAL;
AND LUXURY HOLDINGS LV, LLC, A
NEVADA LIMITED LIABILITY COMPANY,

Respondents.

Case No.: 78187

Appeal from the Eighth Judicial
District Court, the Honorable
Mark Denton Presiding

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

MAC:14229-003 4067563_1

Respondents, Raffi Tufenkjian and Luxury Holdings LV, LLC (“Defendants”), by and through their counsel of record, Marquis Aurbach Coffing, hereby move this Court pursuant to NRAP 31(b) for a 30-day extension of time to file their answering brief and appendix.

Defendants’ answering brief and appendix were originally due on May 11, 2020. This Court granted a 30-day extension on May 12, 2020, making Defendants’ answering brief and appendix due on June 10, 2020. If this Court grants this request for a 30-day extension, Defendants’ answering brief and appendix will be due on July 10, 2020. Good cause exists for allowing Defendants to extend the filing deadline until July 10, 2020:

1. Defendants’ motion to strike appellants’ appendix and motion to stay briefing, which was filed on May 27, 2020, is still pending before this Court, and Defendants are not sure if a new appendix will be forthcoming or if the briefing deadlines will be rescheduled. As such, Defendants now file this motion just to be certain they have complied with this Court’s rules regarding briefing deadlines and extensions;

2. An answering appendix has been prepared, and counsel for Defendants has been diligently working to draft the answering brief, which is substantially complete except for citations to the appellants’ appendix. Indeed, the

undersigned has found it very difficult to complete the pin cites to the record because of the lack of legible numbering on large portions of the appellants' appendix, despite expending numerous hours counting and recounting to be certain of the citations he is providing within the answering brief. That is the very reason Defendants have requested that this Court strike the appellants' appendix and require a properly prepared, NRAP compliant appendix to be filed.

3. In addition to the extra time required to finalize the answering brief due to the citation issue already described, counsel has also been involved in a number of depositions and hearings in recent weeks due to the State's easing of the COVID restrictions on the Courts and on the public in general, including preparation for and attendance at oral argument in California Court of Appeals Case No. B294515 (*Farina, et al. v. SAVWCL, LLC, et al.*) and three depositions in Fifth Judicial District Court Case No. CV39343 (*Estate of Fonteneau v. Davita Medical Management, LLC, et al.*), which has also caused a slight delay in finalizing the answering brief and appendix.

Defendants, therefore, respectfully request that this Court grant them a 30-day extension of time to file their answering brief and appendix through July 10, 2020, or as further determined by this Court in deciding Defendants' May 27, 2020 motion to strike appellants' appendix and motion to stay briefing.

This motion is submitted in good faith and for good cause shown in accordance with NRAP 31(b).

Dated this 10th day of June, 2020.

MARQUIS AURBACH COFFING

By /s/ Christian T. Balducci

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF AND APPENDIX** was filed electronically with the Nevada Supreme Court on the 10th day of June, 2020. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

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/s/ Leah Dell

Leah Dell, an employee of
Marquis Aurbach Coffing