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Elizabeth A. Brown
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IN THE SUPREME COURT OF THE STATE OF NEVADA

NANYAH VEGAS, LLC, A
NEVADA LIMITED LIABILITY
COMPANY,

Appellant,

vs.

SIG ROGICH, A/K/A SIGMUND
ROGICH, INDIVIDUALLY, AND
AS TRUSTEE OF THE ROGICH
FAMILY IRREVOCABLE TRUST;
ELDORADO HILLS, LLC, A
NEVADA LIMITED LIABILITY
COMPANY; TELD, LLC, A
NEVADA LIMITED LIABILITY
COMPANY; PETER ELIADES,
INDIVIDUALLY AND AS
TRUSTEE OF THE ELIADES
SURVIVOR TRUST OF 10/30/08;
AND IMITATIONS, LLC, A
NEVADA LIMITED LIABILITY
COMPANY,

Supreme Court No. 79917

District Court No. A686303

**RESPONDENTS' REPLY IN
SUPPORT OF THEIR JOINT
MOTION FOR EXTENSION OF
ANSWERING BRIEF
DEADLINE (FIRST REQUEST)**

Respondents.

SIG ROGICH, A/K/A SIGMUND
ROGICH, INDIVIDUALLY AND
AS TRUSTEE OF THE ROGICH
FAMILY IRREVOCABLE TRUST,

Cross-Appellant,

vs.

NANYAH VEGAS, LLC, A
NEVADA LIMITED LIABILITY
COMPANY,

Cross-Respondent,

and

ELDORADO HILLS, LLC, A
NEVADA LIMITED LIABILITY
COMPANY; TELD, LLC, A
NEVADA LIMITED LIABILITY
COMPANY; PETER ELIADES,
INDIVIDUALLY AND AS
TRUSTEE OF THE ELIADES
SURVIVOR TRUST OF 10/30/08;
AND IMITATIONS, LLC, A
NEVADA LIMITED LIABILITY
COMPANY,

Respondents.

MEMORANDUM OF POINTS AND AUTHORITIES

Nanyah Vegas, LLC's ("Nanyah") Opposition confirms that Nanyah is
unwilling to stipulate to the same extension request that Nanyah twice
received merely because Nanyah is frustrated that the Eliades Respondents

1 moved to dismiss Nanyah's bankruptcy and that the Respondents sought to
2 execute on their valid judgments. In other words, Nanyah believes that
3 Respondents are not entitled to an extension because they continue to
4 diligently represent their clients in their dispute with Nanyah. The Eliades
5 Respondents are perfectly within their rights to challenge Nanyah's
6 bankruptcy filing, and if the bankruptcy court believes that the bankruptcy
7 filing was in bad faith, the Motion to Dismiss will be granted. If not, it will be
8 denied. But it should not have any effect on whether an extension is
9 warranted in this appeal. Likewise, Nanyah could have stayed any execution
10 efforts by posting a supersedeas bond, and chose not to do so. Again, that should
11 not have any effect on this Joint Motion. These perfectly appropriate litigation
12 activities by the Respondents are no basis to deny their first and only request
13 for an extension.

14 Nanyah does not dispute that the Rogich Respondents have a conflicting
15 trial schedule that does not permit them to prepare and file an Answering Brief
16 within the current deadline. Nanyah does not dispute that because of the
17 overlapping issues in this appeal and the Eliades Respondents' obligation to
18 respond to the Rogich Respondents' Opening Brief on cross-appeal, all parties

1 should remain on the same briefing schedule. Nanyah also does not dispute
2 that this appeal (14 separate issues and an oversized Opening Brief) is larger
3 than typical, therefore requiring additional time to respond. These are the
4 bases for the Joint Motion, and they all support a 90 day extension.

5 Accordingly, Respondents request that their current deadline of
6 August 26, 2021 be extended to November 24, 2021.

7 DATED this 18th day of August, 2021.

8 BAILEY ♦ KENNEDY

9 By: /s/ Dennis L. Kennedy
10 DENNIS L. KENNEDY
JOSEPH A. LIEBMAN

11 *Attorneys for Eliades Respondents*

12 HUTCHISON AND STEFFEN

13 By: /s/ Brenoch Wirthlin
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CERTIFICATE OF SERVICE

I certify that I am an employee of BAILEY ♦ KENNEDY and that on the 18th day of August, 2021, service of the foregoing **RESPONDENTS' REPLY IN SUPPORT OF THEIR JOINT MOTION FOR EXTENSION OF ANSWERING BRIEF DEADLINE (FIRST REQUEST)** was made by electronic service through the Nevada Supreme Court's electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known addresses:

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/s/ Sharon L. Murnane
Employee of BAILEY ♦ KENNEDY