

IN THE SUPREME COURT OF THE STATE OF NEVADA

PAUL D.S. EDWARDS,

Appellant,

vs.

TIMESHARE LIQUIDATORS, LLC, a/d/b/a TLC RESORT LIQUIDATORS, a/d/b/a TLC RESORTS VACATION CLUB, LLC, a/d/b/a TLC RESORTS VACATION CLUB, a/d/b/a TLC RESORTS, a/k/a TLCRESORTS.COM, a/d/b/a TLC TRAVEL, a/k/a TLC, a/d/b/a VIP TRAVEL, a/d/b/a VIP VACATIONS, a/d/b/a VIP INTERNATIONAL, and PLAZA HOTEL & CASINO, LLC, a/d/b/a PLAZA HOTEL & CASINO, and CASH4ASKING, LLC, a/d/b/a CASH4ASKING.COM, and STANLEY C. MULLIS, a/k/a STANLEY MULLIS, a/k/a STAN MULLIS, and ANGEL C. MULLIS, a/k/a ANGEL MULLIS, a/k/a ANGEL SANTILLI, and JONATHAN ROBERT JOSSEL, a/k/a JONATHAN JOSSEL, and EDUARDO ROMAY HERNANDEZ, a/k/a EDUARDO L ROMAY HERNANDEZ, a/k/a EDUARDO ROMARY, a/k/a EDUARDO L. ROMAY HERNANDEZ, a/k/a HERNANDEZ EDUARDO ROMAY, a/lc/a HERNANDEZ EDUARDO L OMay, a/k/a EDUARDO ROMAY, a/k/a MR EDUARDO L. ROMAY, and GLADYS C. RIONDA, a/k/a SUI TO GLADYS RIONDA, a/k/a GLADYS C. RIONDA-SUITO, a/k/a GLADYS SUI TO, a/k/a GLADYS RIONDA SUI TO,

Respondents.

PAUL D.S. EDWARDS,

Appellant,

vs.

Case No.: 81595

Electronically Filed
Oct 13 2021 04:33 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

consolidated with
No. 81759

MAC:15795-001 4507065_1

TIMESHARE LIQUIDATORS, LLC, A/D/B/A TLC
RESORT LIQUIDATORS, A/D/B/A TLC RESORTS,
A/D/B/A TLC RESORTS VACATION CLUB,
A/D/B/A TLC RESORTS VACATION CLUB, LLC,
A/D/B/A TLC TRAVEL, A/D/B/A
TLCRESORTS.COM, A/D/B/A VIP TRAVEL,
A/D/B/A VIP VACATIONS; CASH4ASKING,
LLC, A/D/B/A CASH4ASKING.COM; STANLEY
C. MULLIS, A/K/A STANLEY MULLIS, A/K/A
STAN MULLIS; ANGEL MULLIS, A/K/A ANGEL
C. MULLIS; EDUARDO ROMAY HERNANDEZ,
A/K/A EDUARDO L. ROMAY HERNANDEZ,
A/K/A EDUARDO ROMARY, A/K/A EDUARDO
L. ROMAY HERNANDEZ, A/K/A HERNANDEZ
EDUARDO ROMAY, A/K/A HERNANDEZ
EDUARDO L. ROMAY, A/K/A EDUARDO
ROMAY, A/K/A EDUARDO L. ROMAY; AND
GLADYS C. RIONDA, A/K/A SUITO GLADYS
RIONDA, A/K/A; GLADYS C. RIONDA-SUITO,
A/K/A GLADY SUITO, A/K/A GLADYS RIONDA
SUITO,

**MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO
PETITION FOR EN BANC RECONSIDERATION**

(First Written Request)

(Second overall request)

Marquis Aurbach Coffing

Chad F. Clement, Esq.

Nevada Bar No. 12192

Kathleen A. Wilde, Esq.

Nevada Bar No. 12522

10001 Park Run Drive

Las Vegas, Nevada 89145

Telephone: (702) 382-0711

Facsimile: (702) 382-5816

cclement@maclaw.com

kwilde@maclaw.com

Attorneys for Cash4Asking, LLC;

Eduardo Romay Hernandez; and Gladys Rionda Suito

Cash4Asking, LLC, Eduardo Romay Hernandez, and Gladys Rionda Suito [cumulatively “Cash4Asking”], by and through their counsel of record, Marquis Aurbach Coffing, hereby moves this Court for a 14-day extension of time to file a Response to Appellant Paul D.S. Edwards’ Petition for En Banc Reconsideration.

On November 25, 2020, Cash4Asking moved to dismiss the portion of Edwards’ consolidated appeals pertaining to Eighth Judicial District Court case number A-19-799140-C for lack of jurisdiction. On April 8, 2021, this Court issued an order granting the motion and partially dismissing Edwards’ appeals. *See* Exhibit 1, attached hereto. In the order the Court specified that the Cash4Asking Respondents “are dismissed entirely from these appeals.” *Id.* at 3-4.

Consistent with the Court’s order, the case caption was modified and the Cash4Asking Respondents were removed from the Court’s service list. On the Court’s Appellate Case Management System, the Cash4Asking Respondents were removed from the list under the “party information” header. And, in the eflex electronic filing system, the instant matter was removed from counsels’ “My Cases” list.

After the dismissal, neither the Cash4Asking Respondents nor their counsel received notices about subsequent events. So, when Edwards filed his proper person petition for reconsideration, the Cash4Asking Respondents did not receive the petition. Likewise, the Cash4Asking Respondents did not receive the Court’s

September 9, 2021, Order Directing Answer to Petition for En Banc Reconsideration. In fact, the “cc” line of the Court’s order indicates that the Order was not served upon the Cash4Asking Respondents’ counsel.

On September 15, 2021, the Court issued an Amended Order Directing Answer to Petition for En Banc Reconsideration. The substance of the order was unchanged, but the “cc” line of the amended order was updated to include Marquis Aurbach Coffing. As the Cash4Asking Respondents are no longer parties to the underlying appeals, counsel did not receive electronic service of the order. Instead, counsel received a paper copy of the order via mail.

On September 29, 2021, counsel requested a telephonic extension of time on behalf of the Cash4Asking Respondents so they could assess the situation and update the client representatives. The Court granted the request and issued an order setting a new due date of October 13, 2021.

If the Court grants the instant request for a 14-day extension, the Response to Edwards’ Petition for En Banc Reconsideration will be due on October 27, 2021. Good cause and compelling circumstances support the requested extension because neither the Cash4Asking Respondents nor their counsel anticipated further proceedings would be needed months after the Court dismissed the Cash4Asking Respondents from this case. Although counsel promptly re-opened the matter, contacted the clients, and began assessing the last six months’ worth of filings,

counsels' previously-scheduled matters in other cases could not be moved on limited notice. In particular, three substantive hearings could not be moved without risking the wrath of the presiding jurists. Counsel also could not extend deadlines relating to a guardianship matter where the protected person is currently without a guardian for her estate.

To make matters worse, counsel was then ill with sinusitis and laryngitis throughout the week of October 4th. Although counsel is en route to a full recovery, counsel exercised extra caution until COVID-19 was ruled out.

The Cash4Asking Respondents appreciate the importance of submitting a quality response for the Court's consideration. Accordingly, for the foregoing reasons and without any intent of causing undue delay, Respondents respectfully submit that a second extension of time should be granted.

Dated this 13th day of October, 2021.

MARQUIS AURBACH COFFING

By: /s/ Chad F. Clement

Chad F. Clement, Esq. (SBN 12192)

Kathleen A. Wilde, Esq. (SBN 12522)

10001 Park Run Drive

Las Vegas, Nevada 89145

Attorneys for Cash4Asking, LLC;

Eduardo Romay Hernandez; and Gladys

Rionda Suito

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO PETITION FOR EN BANC RECONSIDERATION** was filed electronically with the Supreme Court of Nevada on the 13th day of October, 2021. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Brian Clark

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

Paul D.S. Edwards
713 Wheat Ridge Lane, Unit 203
Las Vegas, Nevada 89145
Appellant, pro se

/s/ Leah Dell
An employee of Marquis Aurbach Coffing