

IN THE SUPREME COURT OF THE STATE OF NEVADA

Electronically Filed
Mar 21 2022 02:59 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

TRP FUND VI, LLC, a Nevada
Limited Liability Company,

Appellant,

CASE NO. 84407

(8th Judicial District Court Case No.
A-22-848493-C)

vs.

QUALITY LOAN SERVICE
CORPORATION, a foreign
corporation; PHH MORTGAGE
CORPORATION, a foreign
corporation FEDERAL NATIONAL
MORTGAGE ASSOCIATION, a
National Banking Entity,

Respondents.

**MOTION FOR PERMISSION TO EXCEED
PAGE LIMIT ON EMERGENCY MOTION UNDER
NRAP 27(e) FOR INJUNCTION / STAY PENDING APPEAL**

(Action Required Prior to Sale Date of April 1, 2022)

JOHN HENRY WRIGHT, ESQ.
Nevada Bar No. 6182
THE WRIGHT LAW GROUP, P.C.
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*Attorney for Appellant
TRP FUND VI, LLC*

COME NOW APPELLANT, TRP FUND VI, LLC, by and through its counsel of record, JOHN HENRY WRIGHT, ESQ., of THE WRIGHT LAW GROUP, P.C., and hereby request that this Honorable Court grant permission for the Appellant to exceed the page limit to a total of 23 pages, pursuant to NRAP 27(d)(2). This Motion is necessitated by the complex issues presented and the amount of space required to fully brief those issues requires significantly more pages than those permitted under Rule 27. For the reasons set forth in the attached Declaration of Counsel, Appellant respectfully request the Court grant the instant Motion.

DECLARATION OF COUNSEL

After first being duly sworn under oath and penalty of perjury, I John Henry Wright, hereby attest, declare and submit as follows:

1. I am an attorney licensed to practice before the Nevada Supreme Court.
I am counsel for the Appellant in this appeal.
2. That contemporaneously herewith, Appellant has filed an Emergency Motion Under NRAP 27 For Injunction Pending Appeal (“Emergency Motion”).
3. The Emergency Motion requests that this Court issue an injunction to prevent a wrongful foreclosure on property owned by Appellant, which is scheduled for April 1, 2022, at 9:00 a.m.

4. Every effort was made to brief the issues within the page limits allowed. However, due to the excessive amount of briefing and the novel issues presented, it has been impossible for Appellant to address all issues raised in the allotted 10-page limit.
5. Declarant submits that good cause exists to allow Appellant to exceed the page limitations and we respectfully request the Court grant this motion and allow the Emergency Motion to be filed and accepted by the Clerk, and the Court consider the Emergency Motion without prejudice to its length.
6. I declare under penalties of perjury under the laws of the State of Nevada and of the United States that the foregoing is true and correct.

Dated this 21st day of March, 2022.

Submitted by:

THE WRIGHT LAW GROUP, P.C.

/s/ John Henry Wright, Esq.
JOHN HENRY WRIGHT, ESQ.
Nevada Bar No. 6182
2340 Paseo Del Prado, Suite D-305
Las Vegas, Nevada 89102
Telephone: (702) 405-0001

Attorney for the Appellant
TRP FUND VI, LLC

NRAP 27 (e) CERTIFICATE

This Certificate is made in good faith and pursuant to and in compliance with NRAP 27(e).

The undersigned counsel certifies that the instant motion is being made at the earliest opportunity. The Appellant electronically filed its Emergency Motion Under NRAP 27(e) on March 17, 2022.

There is presently a foreclosure on Appellant's property scheduled for April 1, 2022, at 9:00.

Counsel for Respondents have been notified of the filing of the Emergency Motion via email and telephone.

The telephone numbers and offices addresses of opposing counsel are as follows:

WRIGHT, FINLAY & ZAK, LLP
HUGO E. HERNANDEZ-DIAZ, ESQ.
CHRISTINA V. MILLER, ESQ.
7785 W. Sahara Ave., Suite 200
Las Vegas, Nevada 89117
(702) 475-7964

I believe the issue must be addressed on an emergency basis for the following reason: The Appellant's Property is going to be sold at a wrongful foreclosure if this Court does not issue an injunction.

The instant Motion will be electronically filed. Opposing counsel are both on the electronic service list and therefore will receive service of this Motion

instantaneously with its acceptance for filing.

DATED this 21st day of March, 2022.

Respectfully submitted by:
THE WRIGHT LAW GROUP, P.C.

/s/ John Henry Wright, Esq.

JOHN HENRY WRIGHT, ESQ.

Nevada Bar No. 6182

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Las Vegas, Nevada 89102

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Facsimile: (702) 405-8454

Attorney for Appellant
TRP FUND VI, LLC

CERTIFICATE OF SERVICE

I certify that I electronically filed on March 21, 2022, the foregoing **MOTION FOR PERMISSION TO EXCEED PAGE LIMITS ON EMERGENCY MOTION UNDER NRAP 27(e) FOR INJUNCTION PENDING APPEAL** with the Clerk of the Court for the Nevada Supreme Court by using the Court's electronic file and serve system. I further certify that all parties of record are either registered with the Court's electronic filing system or have consented to electronic service and that electronic service shall be made upon and in accordance with the Court's Master Service List.

I declare that I am employed in the office of a member of the bar of this Court at whose discretion the service was made.

I further certify that I served a copy of this document by electronically mailing a true and correct copy, to:

WRIGHT, FINLAY & ZAK, LLP

Christina V. Miller, Esq.

Hugo E. Hernandez-Diaz, Esq.

cmiller@wrightlegal.net

hhdiaz@wrightlegal.net

Attorneys for Defendants PHH Mortgage Corporation and Federal National Mortgage Association

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

None

/s/ Candi Ashdown
An Employee of **The Wright Law Group, P.C.**