

IN THE SUPREME COURT OF THE STATE OF NEVADA

ROBERT G. REYNOLDS,

Appellant,

vs.

RAFFI TUFENKJIAN; AND LUXURY
HOLDINGS LV, LLC

Respondents.

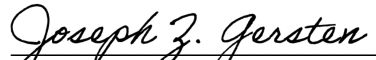
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Jun 09 2022 11:52 a.m.
Elizabeth A. Brown
Clerk of Supreme Court
Supreme Court No.: 84123
District Court Case No.: A753532

MOTION FOR ENLARGEMENT OF TIME

COMES NOW Appellant ROBERT REYNOLDS and DIAMANTI FINE JEWELERS, LLC, by JOSEPH Z. GERSTEN, ESQ. of THE GERSTEN LAW FIRM PLLC, and moves this Court for an enlargement of time within which to file the Appellant's Opening Brief and Appendix due June 30, 2022. This motion is based on the following memorandum and declaration of counsel and all papers and pleadings on file herein.

Dated this 9th day of June 2022.

Respectfully submitted,


JOSEPH Z. GERSTEN

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MEMORANDUM

I, JOSPEH Z. GERSTEN, am a duly licensed attorney in the State of Nevada and am employed by The Gersten Law Firm PLLC. The Petitioner is requesting a minimum 120-day extension of time in which to file his Opening Brief under NRAP 26(b)(1)(A) and NRAP 31(b)(3). Appellant's Opening Brief and Appendix are currently due June 30, 2022. This is the Appellant's First request for an extension of time in this case.

This is an Appeal from an Order entered by the District Court.

First, there is essentially a companion case existing under Case Number 84000, here in the Supreme Court which Opening Brief is due June 13, 2022.¹ This second matter is so closely related to this one as to balance on the same facts and circumstances. Judicial effectiveness and efficiency dictate that these two matters should be consolidated. As a result, Appellant needs time to file such a motion to consolidate. Appellant's counsel has discussed said consolidation with Appellee's counsel, to which Appellee's counsel indicated no objection.

Second, a scrivener's error was discovered in this matter 84000, where the second Appellant, Diamanti Fine Jewelers, LLC, was unintentionally left off the Appeal documents. However, they were included in the second matter 84413. Again, as a result, Appellant needs time to file a motion to correct said scrivener's error.

¹ A duplicate motion for extension to consolidate will be filed contemporaneously with 84000.

Appellant's counsel has discussed said correction with Appellee's counsel, to which Appellee's counsel indicated a potential objection.

Due to the above-described circumstances, the Appellant respectfully requests a minimum additional 120-days, within which to file his Opening Brief so as to have time to file a motion to consolidate this matter with 84000 and correct the scrivener's error.

This motion is made in good faith and not for purposes of undue delay. The Appellant also notes that the Appellee will not be prejudiced by the extension, as it was a ruling against the Appellant that is the subject of this appeal.

I declare under penalty of perjury that the factual representations set forth in the foregoing memorandum are true and correct.

Dated this 9th day of June 2022.


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CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on the 9th day of June 2022. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

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BY Joseph Z. Gersten
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