

**THE SUPREME COURT OF THE STATE OF NEVADA**

ROBERT G. REYNOLDS, AN  
INDIVIDUAL,

Appellant,

vs.

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

Respondents.

ROBERT G. REYNOLDS, AN  
INDIVIDUAL,

Appellant,

vs.

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

Respondents.

SUPREME COURT NO. 84000

District Court Case No. A753532

Electronically Filed  
Aug 04 2022 11:40 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

SUPREME COURT NO. 84413

**RAFFI TUFENKJIAN AND LUXURY HOLDINGS, LV, LLC'S  
LIMITED RESPONSE TO MOTION TO WITHDRAW AS COUNSEL**

**Marquis Aurbach**

Christian T. Balducci, Esq.

Nevada Bar No. 12688

10001 Park Run Drive

Las Vegas, Nevada 89145

T: (702) 382-0711 | F: (702) 382-5816

[cbalducci@maclaw.com](mailto:cbalducci@maclaw.com)

*Attorneys for Respondents*

## **I. LEGAL ARGUMENT**

Respondents do not *per se* oppose withdrawal. We would like to point out there are two appeals in this consolidated matter: one from final judgment (#84000), one from a fee and cost award (#84413). Only Appellant Mr. Reynolds timely appealed the final judgment. Diamanti Fine Jewelers in the consolidated matter never appealed the final judgment.

Both Mr. Reynolds and Diamanti Fine Jewelers, LLC filed timely notices of appeal from the attorney fee and cost order entered in favor of Respondents, docketed with this Court as Case No. 84413. However, only Mr. Reynolds filed a case appeal statement in that matter. Diamanti did not.

To the extent Diamanti is going to participate in this appeal with respect to the fee and cost award, a deadline should be set for it to retain counsel since it cannot represent itself. And, since Mr. Reynolds is not an attorney, he cannot represent Diamanti either. *See, e.g., Salman v. Newell*, 110 Nev. 1333, 1336, 885 P.2d 607, 608 (1994) (“no rule or statute permits a [nonlawyer] to represent any other person, a company, a trust, or any other entity” in either the district court or this court.”). Diamanti should be ordered to have counsel appear in this case within fifteen (15) days, else, its appeal should be dismissed.

We are generally ok with an extension from the current deadline not exceeding thirty (30) additional days.

## II. CONCLUSION

We thank the Court for your time and consideration of this pleading.

Dated this 4<sup>th</sup> day of August 2022.

MARQUIS AURBACH

*/s/ Christian T. Balducci*

Christian T. Balducci, Esq.

Nevada Bar No. 12688

10001 Park Run Drive

Las Vegas, Nevada 89145

*Attorneys for Respondents*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing **RAFFI TUFENKJIAN AND LUXURY HOLDINGS, LV, LLC'S LIMITED RESPONSE TO MOTION TO WITHDRAW AS COUNSEL** was electronically served on the 4<sup>th</sup> day of August 2022 in accordance with the Master Service List to the following:

Joseph Z. Gersten  
The Gersten Law Firm PLLC  
9680 W. Tropicana Ave., Suite 146  
Las Vegas, Nevada 89147  
Attorneys for Appellant

/s/ Kellie Piet

An employee of Marquis Aurbach