

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

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SUPREME COURT NO. 84413

**RAFFI TUFENKJIAN AND LUXURY HOLDINGS, LV, LLC'S
OPPOSITION TO MOTION TO EXTEND TIME**

Marquis Aurbach

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I. LEGAL ARGUMENT

A. NO MORE TIME SHOULD BE PROVIDED

It has been no less than two months since Mr. Reynolds and Diamanti's former lawyer moved to withdraw, and roughly six weeks from the order allowing withdrawal of prior counsel and requiring Mr. Reynolds and Diamanti to have new counsel appear, or for Mr. Reynolds to indicate he intends to proceed *pro per*. The deadline for such appearance/filing was October 6, 2022. Diamanti did not have counsel appear and Mr. Reynolds did not file a notice of intent to proceed *pro per*. Instead, Mr. Reynolds mailed a letter to Justice Parraguirre asking for suggestions for lawyers as it relates to the only appeal Diamanti filed (from the fee and cost award, Supreme Court Case No. 84413), and made clear he understood his deadline:

My closing date is THUR 10-5-22 and he has to be indoctrinated.

See Filing Entered on October 4, 2022, on file with the Court.

In his next letter to Justice Parraguirre filed by this Court on October 10, 2022, Mr. Reynolds said a lawyer is going to let him know on October 12, 2022. *See* Filed Entered on October 18, 2022, on file with the Court. It is over a week later; still no notice by counsel and still no notice of intent to proceed *pro per*.

It is abundantly clear Mr. Reynolds and Diamanti want this appeal to sit stagnant while Mr. Tufenkjinan and Luxury Holdings are forced to incur additional fees and costs. No more time should be provided to the Appellants, who now have had well over two months to figure out their situation regarding counsel.

B. THE APPEALS SHOULD BE DISMISSED

The basis for dismissal is simple: this Court gave Mr. Reynolds and Diamanti a deadline. They didn't meet that deadline, and even as of today there has been no notice of appearance by counsel or notice of intent to proceed *pro se*. The appeals should be dismissed.

II. CONCLUSION

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

Dated this 20th day of October 2022.

MARQUIS AURBACH

/s/ Christian T. Balducci
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing **RAFFI TUFENKJIAN AND LUXURY HOLDINGS, LV, LLC'S OPPOSITION TO MOTION TO EXTEND TIME** was electronically served on the 20th day of October 2022 in accordance with the Master Service List to the following:

Robert Reynolds
6885 W. Lone Mountain Rd., Apt. 140
Las Vegas, Nevada 89108
Appellant

/s/ Kellie Piet

An employee of Marquis Aurbach