

1 MICHAEL R. MUSHKIN, ESQ.
 Nevada Bar No. 2421
 2 L. JOE COPPEDGE, ESQ.
 Nevada Bar No. 4954
 3 MUSHKIN CICA COPPEDGE
 4 4495 S. Pecos Road
 Las Vegas, Nevada 89121
 5 Telephone: (702) 386-3999
 Facsimile: (702) 454-3333
 6 michael@mccnvlaw.com
 7 jcoppedge@mccnvlaw.com

8 *Attorneys for Plaintiffs*

9 **UNITED STATES DISTRICT COURT**
 10 **DISTRICT OF NEVADA**

<p>11 BRUCE COUTURIER and ELEANOR 12 COUTURIER, 13 Plaintiffs, 14 vs. 15 AMERICAN INVSCO, et al., 16 Defendants.</p>	<p>Case no.: 2:12-cv-01104-APG-NJK Consolidated with Case No's for Trial: 2:12-cv-01106-APG-NJK 2:12-cv-01107-APG-NJK 2:12-cv-01108-APG-NJK 2:12-cv-01110-APG-NJK 2:12-cv-01111-APG-NJK JOINT RULE 6(B)(1) MOTION FOR EXTENSION OF TIME PROVIDED BY LR 54-14 & ORDERS DATED JUNE 28 & 29, 2018 (SECOND REQUEST)</p>
<p>21 SHAHIN EDALATDJU and NASILA 22 EDALATDJU, 23 Plaintiffs, 24 vs. 25 AMERICAN INVSCO, et al., 26 Defendants.</p>	<p>Case no.: 2:12-cv-01106-APG-NJK Consolidated with Case No's for Trial: 2:12-cv-01104-APG-NJK 2:12-cv-01107-APG-NJK 2:12-cv-01108-APG-NJK 2:12-cv-01110-APG-NJK 2:12-cv-01111-APG-NJK</p>

27
28

<p>1 MARY HELDT, VICTOR HELDT, and SNAP 2 PROPERTIES, LLC, a Nevada Limited Liability Company,</p> <p>3 Plaintiffs,</p> <p>4 vs.</p> <p>5 AMERICAN INVSCO, et al.,</p> <p>6 Defendants.</p>	<p>Case no.: 2:12-cv-01107-APG-NJK Consolidated with Case No's for Trial:</p> <p>2:12-cv-01104-APG-NJK 2:12-cv-01106-APG-NJK 2:12-cv-01108-APG-NJK 2:12-cv-01110-APG-NJK 2:12-cv-01111-APG-NJK</p>
<p>8 NASIR KOSA; BASIL KOSA, and SAID 9 MATTI,</p> <p>10 Plaintiffs,</p> <p>11 vs.</p> <p>12 AMERICAN INVSCO, et al.,</p> <p>13 Defendants.</p>	<p>Case no.: 2:12-cv-01108-APG-NJK Consolidated with Case No's for Trial:</p> <p>2:12-cv-01104-APG-NJK 2:12-cv-01106-APG-NJK 2:12-cv-01107-APG-NJK 2:12-cv-01110-APG-NJK 2:12-cv-01111-APG-NJK</p>
<p>15 WISAM KOSA, RAGHID KOSA and MAHA 16 KOSA;</p> <p>17 Plaintiffs,</p> <p>18 vs.</p> <p>19 AMERICAN INVSCO, et al.,</p> <p>20 Defendants.</p>	<p>Case no.: 2:12-cv-01111-APG-NJK Consolidated with Case No's for Trial:</p> <p>2:12-cv-01104-APG-NJK 2:12-cv-01106-APG-NJK 2:12-cv-01107-APG-NJK 2:12-cv-01108-APG-NJK 2:12-cv-01110-APG-NJK</p>

21 **JOINT RULE 6(B)(1) MOTION FOR EXTENSION OF TIME**
22 **PROVIDED BY LR 54-14 &**
23 **ORDERS DATED JUNE 28 & 29, 2018**
24 **(SECOND REQUEST)**

25 The parties, by and through their respective counsel, hereby move for entry of an order
26 under FRCP 6(b)(1) extending the periods provided by LR 54-14 and this court's orders dated
27 June 28 & 29, 2018 pertaining to motions for attorney's fees in each of the above actions, for the
following reasons:

- 28 1. These actions have been pending before this court since their removal in October

1 2008.

2 2. On June 28 & 29, 2018, the court entered orders and judgments of final
3 adjudication regarding each of them.

4 3. In those orders, the court instructed Plaintiffs to file motions for attorney's fees (if
5 any) within 14 days (i.e., on or before July 12, 2018 (as to certain of these actions) and July 13,
6 2018 (as to the rest). It also instructed Plaintiffs' counsel to confer with Defendant Meridian's
7 counsel regarding such matters before filing any such motion.

8 4. LR 54-14 provides that motions for attorney's fees are to be filed within 14 days
9 of the entry of a final judgment or order disposing of an action which the United States Supreme
10 Court has held is the date of entry of an order disposing of the substantive elements of an action,
11 despite the existence or potential for a motion for attorney's fees. *Ray Haluch Gravel Co. v. Cent.*
12 *Pension Fund of Int'l Union of Operating Engineers & Participating Employers*, 134 S. Ct. 773
13 (2014).

14 5. Counsel for all Plaintiffs and the principal Defendants, Koval Flamingo, LLC and
15 Meridian Private Residences CH, LLC have previously requested an extension of time to
16 effectively review each parties' claim(s) for attorney's fees.

17 6. Counsel for all Plaintiffs and the principal Defendants, Koval Flamingo, LLC and
18 Meridian Private Residences CH, LLC have conferred about such matters and are still in
19 discussions regarding each parties' claim(s) for attorney's fees and that it would unduly burden
20 the court and the parties to require such motions to be filed within the period provided by LR 54-
21 14 and the court's orders of June 28 & 29, 2018.

22 7. Accordingly, there is good cause within the meaning of FRCP 6(b)(1) for an
23 extension of the period within which to file the parties' respective motions for attorney's fees in
24 these actions.

25 ///

26 ///

27 ///

28 ///

1 8. The parties are requesting an additional thirty (30) days to continue discussions
2 regarding each parties' claim(s) for attorney's fees.

3 9. This motion is timely pursuant to FRCP 6(b)(1)(A) in that it has been filed prior
4 to the expiration of the period for which extension is sought.

5 Dated this 9th day of August, 2018

6
7 MUSHKIN CICA COPPEDGE

KENNETH B. MORGAN, P.C.

8 /s/ Michael R. Mushkin \

/s/ Kenneth B. Morgan \

9 MICHAEL R. MUSHKIN, ESQ.

Kenneth B. Morgan, Esq. (*Pro Hac Vice*

10 Nevada State Bar No. 2421

Admitted)

11 L. JOE COPPEDGE, ESQ.

180 High Oak Drive, Suite 202

12 Nevada State Bar No. 4954

Bloomfield Hills, MI 48304

13 4475 So. Pecos Road

LAWRENCE J. SEMENZA, III, P.C.

14 Las Vegas, Nevada 89121

Lawrence J. Semenza, III, Esq., Bar No. 7174

15 *Attorneys for Plaintiffs*

Christopher D. Kircher, Esq., Bar No. 11176

Jarrod L. Rickard, Esq., Bar No. 10203


10161 Park Run Drive, Suite 150

Las Vegas, Nevada 89145

*Attorneys for Defendant Meridian Private
Residences CH, LLC*

16
17
18 IT IS SO ORDERED.

19 Dated: August 10, 2018.

20
21 
22 _____
23 UNITED STATES DISTRICT JUDGE
24
25
26
27
28