

Clerk stamps date here when form is filed.

Instructions

- This form is only for requesting an extension of time to file a brief in an appeal in a **limited civil case**. Note that any rules referenced in this form are from the California Rules of Court.
- Before you fill out this form, read *Information on Appeal Procedures for Limited Civil Cases* (form APP-101-INFO) to know your rights and responsibilities. You can get form APP-101-INFO at any courthouse or county law library or online at www.courts.ca.gov/forms.
- Fill out this form and make a copy of the completed form for your records and for each of the other parties.
- Serve a copy of the completed form on each of the other parties and keep proof of this service. You can get information about how to serve court papers and proof of service from *What Is Proof of Service?* (form APP-109-INFO) and on the Self-Help Guide to the California Courts at www.courts.ca.gov/selfhelp-serving.htm.
- Take or mail the completed form and proof of service on the other parties to the appellate division clerk's office. It is a good idea to take or mail an extra copy to the clerk and ask the clerk to stamp it to show that the original has been filed.

You fill in the name and street address of the court that issued the judgment or order that is being appealed:

Superior Court of California, County of
Riverside

You fill in the number and name of the trial court case in which the judgment or order is being appealed:

Trial Court Case Number:

CVCO2405948

Trial Court Case Name:

Dagrella v. Samsung Electronics
America, Inc.

You fill in the appellate division case number:

Appellate Division Case Number:

APRI2500092

1 Your Information

- a. Name of party requesting extension of time to file brief:

Samsung Electronics America, Inc.

- b. Party's contact information (*skip this if the appellant has a lawyer for this appeal*):

Street address: _____

Street

City

State

Zip

Mailing address (*if different*): _____

Street

City

State

Zip

Phone: _____

Email: _____

- c. Party's lawyer (*skip this if the appellant does not have a lawyer for this appeal*):

Name: Robert J. Herrington (SBN 234417); Jennifer C. Cooper (SBN 324804); Evan Morehouse (SBN 358293)

State Bar number: Listed with attorney names

Street address: Greenberg Traurig, LLP, 1840 Century Park E. Ste. 1900 Los Angeles

CA

90067

Street

City

State

Zip

Mailing address (*if different*): _____

Street

City

State

Zip

Phone: 310-586-7700

Email: Robert.Herrington@gtlaw.com; Jennifer.Cooper@gtlaw.com; Evan.Morehouse@gtlaw.com

Fax: 310-586-7800



- 2 I am requesting an extension on the time to file:
- ☒ Appellant's opening brief, which is now due on (date): September 12, 2025
- ☐ Respondent's brief, which is now due on (date): _____
- ☐ Appellant's reply brief, which is now due on (date): _____
- ☐ Supplemental or other brief, which is now due on (date): _____
- 3 I am requesting that the time to file the brief identified in 2 be extended to (date): October 13, 2025
For an extension of (total number of days sought): 31 days.
- 4 I ☐ have ☒ have not received a default notice under rule 8.882(c) from the clerk that this brief must be filed within 15 days.
- 5 The time to file the brief (check all that apply):
- ☒ Has not been extended before.
- ☐ Has been extended before by the stipulation of the parties. The parties stipulated to (number of extensions) _____ totaling (number of days) _____
- ☐ Has been extended before by the court. The court granted (number of extensions) _____ totaling (number of days) _____
- 6 I am not able to stipulate to an extension to file this brief because (check one):
- ☒ The other party is not willing to stipulate to an extension.
- ☐ The maximum stipulated time has already been used.
- ☐ Other reason (please describe the reason): _____
- 7 ☐ This appeal is eligible for calendar preference/priority because (cite authority or explain): _____
- 8 The reason I need an extension to file this brief is (describe the reason you need an extension; please address the rule 8.811(b) factors, including possible prejudice to the parties): _____
- ☒ Check here if there is not enough space for your answer. Put your complete answer on an attached sheet of paper, and write "Attachment 8" for a title. You may use form APP-031.
- 9 The last brief filed by any party in this case was:
- ☐ The appellant's opening brief, filed on (date): _____
- ☐ The respondent's brief, filed on (date): _____
- ☐ The appellant's reply brief, filed on (date): _____
- ☐ A supplemental or other brief, filed on (date): _____
- 10 If this extension is being requested by a lawyer on behalf of a client, the lawyer must complete this item.
- ☒ I certify that I have delivered a copy of this application to my client (rule 8.810(e)). I declare under penalty of perjury under the laws of the State of California that the information above is true and correct.

Date: September 10, 2025Jennifer C. Cooper

Type or print your name

/s/ Jennifer C. Cooper

Signature of party or attorney

APPELLANT: Samsung Electronics America, Inc. RESPONDENT: Jerry Dagrella	COURT OF APPEAL CASE NUMBER: APRI2500092 SUPERIOR COURT CASE NUMBER: CVCO2405948
--	---

ATTACHED DECLARATION (COURT OF APPEAL)

(This form must be attached to another form or court paper before it can be filed in court.)

Appellant Samsung Electronics America, Inc. ("SEA"), by and through its attorneys of record, respectfully requests a 30-day extension to file its opening brief. This appeal, in part, arises from the trial court's order granting Plaintiff's motion for summary judgment on his third cause of action for negligence, which is based on the alleged negligent conduct of the technician who performed repair services for Plaintiff at his residence on September 4, 2024. The technician is an employee of the independent repair facility, Service Quick, Inc. ("Service Quick"). SEA is presently engaged in settlement discussions with Service Quick regarding its indemnification obligations with respect to the portion of the trial court's judgment that awarded Plaintiff his negligence damages. SEA needs additional time to finalize these settlement discussions because said discussions may result in the payment of the judgment to Plaintiff and the abandonment of this appeal. SEA therefore respectfully asks that the Court grant the requested 30-day extension to provide SEA with sufficient time to potentially resolve the issues in this appeal without the need for further court intervention. See California Rule of Court, Rule 8.811(b) (5).

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: Sep 10, 2025

Jennifer C. Cooper

(TYPE OR PRINT NAME)



/s/ Jennifer C. Cooper

(SIGNATURE OF DECLARANT)

☒

Attorney for

☒

Appellant

☐

Respondent

☐

Other (specify):

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES:**

3 I am employed in the aforesaid county, State of California; I am over the age of 18 years and not a
4 party to the within action; my business address is 1840 Century Park East, Suite 1900, Los Angeles,
California 90067-2121 and email address is debi.delgrande@gtlaw.com.

5 On September 10, 2025, I served the following document: **APPLICATION FOR EXTENSION**
6 **OF TIME TO FILE BRIEF – LIMITED CIVIL CASE** on the interested parties in this action
addressed as follows:

7 Jerry R. Dagrella
8 DAGRELLA LAW FIRM, P.C.
1001 Wilshire Blvd., Suite 2228
9 Los Angeles, CA 90017
Tel: (714) 292-8249
Em: dagrella@lawyer.com

10 Jason M. Ackerman
11 ACKERMAN LAW, PC
3200 East Guasti Road, Suite 100
12 Ontario, CA 91761
Tel: (909) 456-1460
13 Em: jason.ackerman@ackermanlawpc.com

14
15 ☒ **[BY MAIL]** By placing the document(s) listed above in a sealed envelope with postage thereon
16 fully prepaid, in the United States mail at Los Angeles, California addressed as set forth below. I
17 am familiar with the firm's practice of collection and processing correspondence for mailing.
Under that practice it would be deposited with the U.S. postal service on that same day with
postage thereon fully prepaid in the ordinary course of business.

18 ☒ **[BY E-MAIL]** By transmitting via e-mail the document(s) listed above to the addresses set forth
19 below on this date.

20 I declare under penalty of perjury under the laws of the State of California that the above is true
and correct.

21 Executed on September 10, 2025 at Los Angeles, California.

22 /s/ Debi Del Grande
23 Debi Del Grande
24
25
26
27
28