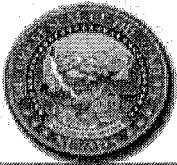


**Exhibit “2”**

**Exhibit “2”**



## SUPREME COURT NEVADA

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user: H. Stan Johnson

Filing Status ⇒ Filed Subject To Acceptance

## Filing Status

### Filing Status - Filed Subject To Acceptance

Submitted By: Johnson, H. Stan  
To: Supreme Court of Nevada  
Filing Status: Filed Subject To Acceptance  
Date Submitted: May 07 2015 09:10 a.m.  
Date Received: May 07 2015 09:10 a.m.  
Official File Stamp:

Case Title:

Case Category: Other

Document Category: Brief

Docket Number: 64349

Filing ID: 342900

Filing Status to be deleted on: 08-05-2015

**Document Name****View Document**

Brief GSR's Reply Brief on Cross-Appeal Reply Brief.pdf

Form Data Generated XML Data

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**Exhibit “1”**

**Exhibit “1”**

1  
2  
3 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

Electronically Filed  
Jan 28 2015 03:16 p.m.  
Tracie K. Lindeman  
Clerk of Supreme Court

4 GOLDEN ROAD MOTOR INN, INC., a  
5 Nevada Corporation d/b/a ATLANTIS  
6 CASINO RESORT SPA,

Appellant/Cross-Respondent,  
7 vs.

8 SUMONA ISLAM, an individual,  
Respondent/Cross-Appellant  
9 and

10 MEI-GSR HOLDINGS LLC, a Nevada  
limited liability company d/b/a GRAND  
11 SIERRA RESORT which claims to be  
the successor in interest to NAV-RENO-  
12 GS, LLC,

13 Respondent.

14 SUMONA ISLAM, an individual,  
Appellant

15 vs.

16 GOLDEN ROAD MOTOR INN, INC., a  
Nevada Corporation d/b/a ATLANTIS  
17 CASINO RESORT SPA,

18 Respondent.

19 MEI-GSR HOLDINGS LLC d/b/a  
GRAND SIERRA RESORT,

20 Appellant/Cross-Respondent,  
vs.

21 GOLDEN ROAD MOTOR INN, INC., a  
Nevada Corporation d/b/a ATLANTIS  
22 CASINO RESORT SPA,

23 Respondent/Cross-Appellant.

Case No.: 64349

Case No.: 64452

Case No.: 65497

24 **STIPULATION FOR EXTENSION OF**  
25 **TIME TO FILE ANSWERING AND REPLY BRIEFS**

26 IT IS HEREBY STIPULATED AND AGREED, by and between the parties  
27 to these appeals, through their undersigned counsel, pursuant to NRAP 31(b)(2),  
28 that Golden Road Motor Inn, Inc. d/b/a Atlantis Casino Resort Spa ("Atlantis")

1 shall have an extension of thirty days, or until March 2, 2015 to file its briefs  
2 Replying to the Answering briefs filed MEI-GSR Holdings LLC d/b/a Grand  
3 Sierra Resort and Sumona Islam, as well as its Answering brief to the cross-appeal  
4 of MEI-GSR Holdings LLC d/b/a Grand Sierra Resort ("GSR"). Those briefs are  
5 currently due on January 31, 2015.

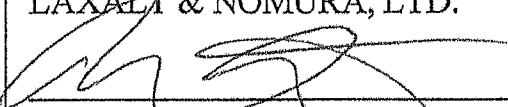
6 It is further stipulated and agreed that GSR shall file any Reply brief within  
7 60 days after service of Atlantis' Answering brief on GSR's cross-appeal.

8 DATED: 1/28/15

DATED: \_\_\_\_\_

9  
10 LAXALT & NOMURA, LTD.

LAW OFFICES OF MARK WRAY

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12 ROBERT A. DOTSON (SBN #5285)  
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Sumona Islam

17 DATED: 1-28-15

18 COHEN-JOHNSON, LLC

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20 H. STAN JOHNSON (SBN #00265)  
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22 Las Vegas, Nevada 89119  
23 Attorneys for Appellant/Respondent  
24 MEI-GSR Holdings, LLC dba  
Grand Sierra Resort

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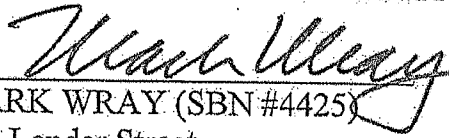
17 DATED: \_\_\_\_\_

18 COHEN-JOHNSON, LLC

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21 H. STAN JOHNSON (SBN #00265)  
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23 Las Vegas, Nevada 89119  
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Grand Sierra Resort

DATED: Jan 28, 2015

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*Attorneys for Respondent/Cross-Appellant,  
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Electronically Filed  
Jun 03 2015 11:40 a.m.  
Tracie K. Lindeman  
Clerk of Supreme Court

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

GOLDEN ROAD MOTOR INN, INC., a  
Nevada Corporation d/b/a ATLANTIS CASINO  
RESORT SPA,

Appellant/Cross Respondent,  
vs.

SUMONA ISLAM, an individual,

Respondent/Cross-Appellant

and

MEI-GSR HOLDINGS, LLC, a Nevada limited  
liability company d/b/a/ GRAND SIERRA  
RESORT which claims to be the successor in  
interest to NAV\_RENO- GS, LLC.

Respondent.

**Case No.: 64349**

SUMONA ISLAM, an individual,

Appellant,

vs.

GOLDEN ROAD MOTOR INN, INC., a Nevada  
Corporation d/b/a ATLANTIS CASINO RESORT  
SPA,

Respondent.

**Case No.: 64452**

MEI-GSR HOLDINGS LLC d/b/a GRAND  
SIERRA RESORT,

Appellant,

vs.

GOLDEN ROAD MOTOR INN, INC., a Nevada  
Corporation d/b/a ATLANTIS CASINO RESORT  
SPA,

Respondent

Case No.: 65497

**RESPONDENT/CROSS APPELLANT'S MOTION FOR LEAVE TO FILE AN  
UNTIMELY REPLY**

Respondent/Cross Appellant, MEI-GSR Holdings, LLC. d/b/a Grand Sierra Resort, by and  
though its counsel of record, H. Stan Johnson, Esq. of Cohen|Johnson, LLC, respectfully  
requests that it be granted an Leave to File an Untimely Reply Brief. Appellant sets forth the  
following in support of this motion.

This Motion is based on the pleadings and papers on file herein, the exhibits attached hereto,  
the Affidavits submitted herewith, and any argument this court may entertain.

Dated this 3<sup>rd</sup> day of June, 2015

**COHEN|JOHNSON, LLC.**

By: /s/ H. Stan Johnson  
H. Stan Johnson, Esq.  
Nevada Bar No. 00265  
Steven B. Cohen, Esq.  
Nevada Bar No. 2327  
255 E. Warm Springs Road, Ste. 100  
Las Vegas, NV 89119  
*Attorneys for Respondent/Cross  
Appellant MEI-GSR Holdings, LLC.  
d/b/a Grand Sierra Resort and Casino*



**POINTS AND AUTHORITIES**

**I.**

**BACKGROUND**

The parties agreed to allow Golden Road Motor Inn., Inc. d/b/a Atlantis Casino Report Spa (“Atlantis”) to have a thirty (30) day extension, or until March 2, 2015 to file its’ briefs Replying to the Answering briefs filed MEI-GSR Holdings, LLC d/b/a Grand Sierra Resort and Sumona Islam. (*See Copy of Stipulation for Extension of Time attached as Exhibit “1”*) The brief was currently due on January 31, 2015. The parties further agreed that MEI-GSR Holdings, LLC d/b/a Grand Sierra Report (“GSR”) would have 60 days after service of Atlantis’s Answering brief on GSR’s cross-appeal. Based on the extension, GSR would have until May 2, 2015 to file its Reply. In fact, there was oversight on the calendar and the Reply was filed May 7, 2015. (*See copy of receipt attached as Exhibit “2”*)

Based on the foregoing, the Appellant requests that the Court allow the filling of the GSR’s Reply Brief on Cross-Appeal that was filed on the 7<sup>th</sup> of May, 2015. This will not delay or unduly prejudice the parties. No other deadlines need to be amended as a result of this request.

**II.**

**STATEMENT OF THE LAW**

NRAP 31(b)(3)

**Motions for Extensions of Time.** A motion for extension of time for filing a brief may be made no later than the due date for the brief and must comply with the provisions of this Rule and Rule 27.

**Contents of Motion.**

A motion for extension of time for filing a brief shall include the following:

- (i) The date when the brief is due;
- (ii) The number of extensions of time previously granted (including a 5-day telephonic extension), and if extensions were granted, the original date when the brief was due;

- (iii) Whether any previous requests for extensions of time have been denied or denied in part;
- (iv) The reasons or grounds why an extension is necessary; and
- (v) The length of the extension requested and the date on which the brief would become due.

In this present matter, the Reply Brief was due May 2, 2015. The parties had already agreed by stipulation to allow Atlantis additional time to file its respective brief. GSR has made no requests by motion for any extensions of time to file any documents in this case. This was an inadvertent error and the matter was not filed on the correct day. GSR's Reply is already filed pending approval from this Court to allow the late filing and as such there is no additional time needed to complete the Reply. This delay will not adversely affect any court ordered dates and the Respondent will not be unduly prejudiced by the delay.

### III.

#### Conclusion

Based on the above the Respondent/Cross Appellant respectfully requests that the Court allow the late filing and accept the late filed reply brief.

Dated this 3<sup>rd</sup> day of June, 2015

**COHEN|JOHNSON, LLC.**

By: /s/ H. Stan Johnson  
H. Stan Johnson, Esq.  
Nevada Bar No. 00265  
Steven B. Cohen, Esq.  
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Las Vegas, NV 89119  
*Attorneys for Respondent/Cross  
Appellant MEI-GSR Holdings, LLC.  
d/b/a Grand Sierra Resort and Casino*

**INDEX OF EXHIBITS**

<b><u>Exhibits</u></b>	<b><u>Description</u></b>	<b><u>Pages</u></b>
<b>1.</b>	Stipulation for Extension of Time	3
<b>2</b>	Receipt of Filing from May 7, 2015	2

**CERTIFICATE OF SERVICE**

The hereby certify that I am an employee of Cohen-Johnson, LLC, and that on the 3<sup>rd</sup> day of June, 2015, I caused to be served a true and correct copy of the foregoing **RESPONDENT/CROSS APPELLANT'S MOTION FOR LEAVE TO FILE AN UNTIMELY REPLY** in the following manner: Via U.S. Regular Mail and (Electronic Service) Pursuant to Rule 5(d) of the Nevada Rules of Civil Procedure, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by the Court's facilities to the parties listed below at their last-known mailing addresses, on the date above written:

**LAXALT & NOMURA, LTD.**

Robert A. Dotson, Esq.  
9600 Gateway Drive  
Reno, Nevada 89520  
*Attorneys for Appellant/Respondent*  
*Golden Road Motor Inn, Inc. d/b/a*  
*Atlantis Casino Resort and Spa*

**LAW OFFICES OF MARK WRAY**

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*Attorney for Appellant/Respondent Summona*  
*Islam*

/S/ Kelly J. Montgomery  
An employee of Cohen-Johnson, LLC