

IN THE SUPREME COURT OF THE STATE OF NEVADA

A CAB, LLC, and A CAB SERIES LLC,

Appellants

vs

MICHAEL MURRAY, and MICHAEL
RENO, Individually and on behalf of others
similarly situated,

Respondents.

) SUPREME COURT

) CASE # 77050 Electronically Filed
May 28 2020 12:06 p.m.

) Elizabeth A. Brown
Clerk of Supreme Court

) District Court

) Case No.: A-12-669926-C

) **RESPONDENTS' RESPONSE**

) **TO APPELLANTS' MOTION**

) **FOR AN EXTENSION OF TIME**

) **TO FILE OPENING BRIEF**

) **(SECOND REQUEST)**

DECLARATION

Leon Greenberg, an attorney duly licensed to practice law in the State
of Nevada, hereby affirms, under penalty of perjury, that:

1. I am one of the attorneys for the respondents. The statements
made in this declaration are based upon my personal knowledge and personal
observations.

2. I cannot, in good conscience, oppose the appellant's motion to
the extent it is based, as it states in part, on appellant's counsel having "...lost
significant time from the office due to health issues." I feel compelled to

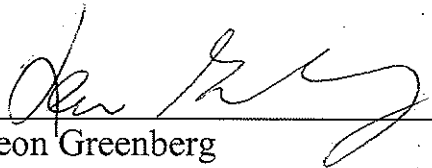
take that position despite my belief appellant¹ (not its counsel) is engaging in improper post-judgment actions that will be advanced by delaying the resolution of this appeal (I do not believe the Court would deem those activities matters properly considered in the context of this motion). Nor would I argue the current public health crises, and the claimed impact it has had on the operations of appellant's counsel, be excluded by the Court from its consideration of whether, in the exercise of discretion, to grant the motion.

3. I request that if the Court grants the appellant's motion it also grant respondents a like extension (60 days) of the normal 30 days provided to respondents by NRAP 31(a)(1) to file their answering brief. While I am not suffering from any personal health impairments, the current public health crises has, generally, impacted my law practice. I want to expedite the resolution of this appeal and I hope to submit respondents' answering brief in far less than 90 days and within 30 days from the date of appellant's brief's

¹ There is only one appellant in this case despite appellant's claim "A Cab Series LLC" is a separate entity from "A Cab LLC." *See, Response to Order to Show Cause Why Portions of Appellant's Appeal Should Not Be Dismissed*, filed January 8, 2020, p. 6-7, fn.5 and this Court's *Order Partially Dismissing Appeal, Amending Caption and Reinstating Briefing*, filed March 6, 2020, p. 1, granting appellant's unopposed request to add A Cab Series LLC as an appellant. As the district court properly found, A Cab Series LLC and A Cab LLC are one entity, the former being the current, and amended, name of the latter.

submission. Yet there is a significant probability I will not be able to do so and accordingly request the Court grant respondents such an extension of time if it grants the appellant's motion.

I affirm the foregoing is true under the penalty of perjury.



Leon Greenberg

5/28/20
Date

PROOF OF SERVICE

The undersigned certifies that on May 28, 2020 he served the
within:

**RESPONDENTS' RESPONSE TO APPELLANTS' MOTION FOR AN
EXTENSION OF TIME TO FILE OPENING BRIEF (SECOND REQUEST)**

by court electronic service to:

TO:

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/s/ Leon Greenberg
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