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Elizabeth A. Brown
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IN THE SUPREME COURT OF THE STATE OF NEVADA

PARVIZ SAFARI, an individual; MANDANA
ZAHEDI, an individual; and on behalf of MEDITEX,
LLC, a Nevada limited liability company,

Appellants,

vs.

HAMID MODJTAHED, individually and derivatively
on behalf of MEDITEX, LLC, a Nevada limited
liability company; and MOHAMMAD MOJTAHED,
individually and derivatively on behalf of MEDITEX,
LLC, a Nevada limited liability company,

Respondents.

Case No.: 79926

**NOTICE OF
APPEARANCE**

Appeal from the Eighth
Judicial District Court,
The Honorable Mark R.
Denton Presiding

NOTICE IS HEREBY GIVEN to the Court and all counsel that Chad F. Clement, Esq. of Marquis Aurbach Coffing is hereby appearing in this matter for Appellant Parviz Safari.

Dated this 23rd day of December, 2019.

MARQUIS AURBACH COFFING

By /s/ Chad F. Clement
Chad F. Clement, Esq.
Nevada Bar No. 12192
10001 Park Run Drive
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Attorneys for Appellant

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **NOTICE OF APPEARANCE** was filed electronically with the Nevada Supreme Court on the 23rd day of December, 2019. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Kristine Kuzemka
Jonathan Blum
Scott Fleming
Andrew Flahive

I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage prepaid, addressed to:

N/A

An employee of Marquis Aurbach Coffing

Marquis Aurbach Coffing

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Attorneys for Appellant Parviz Safari

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ZAHEDI, an individual; and on behalf of MEDITEX,
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MOTION FOR EXTENSION OF TIME TO FILE
DOCKETING STATEMENT

(First Request)

Appellants, PARVIZ SAFARI, an individual (“Appellant”), by and through his counsel of record, Marquis Aurbach Coffing, hereby move this Court pursuant to NRAP 26(b) for a 30-day extension of time to file their docketing statement.

Pursuant to this Court’s November 15, 2019 notice of referral to settlement program, Appellants’ docketing statement was due on December 6, 2019. On December 10, 2019, this Court issued a notice to file docketing statement, which made Appellants’ docketing statement due on December 20, 2019. If this Court grants this request for a 30-day extension, Appellants’ docketing statement will be due on January 20, 2020. Good cause exists for allowing Appellants to extend the filing deadline until January 20, 2020:

1. Marquis Aurbach Coffing was just retained for this appeal today;
2. The underlying case consists of several years of litigation and a record comprised of thousands of pages of documents which will require a substantial amount of time to review in preparing the docketing statement;
3. While Appellants are cognizant that their docketing statement is already overdue, they have taken emergency steps to rectify the situation by retaining new appellate counsel, and new counsel needs some time to become familiar with the history and procedural posture of this case and the companion case in the District Court to properly set forth jurisdiction in this appeal; and

4. Most of the attorneys and staff in counsel's office are out for at least several days over the next two weeks with the holiday and pre-planned vacations, which will add a slight delay in appellate counsel getting up to speed on this case.

Therefore, Appellants respectfully request that this Court grant the instant motion for a 30-day extension of time until January 20, 2020 to file their docketing statement. This Motion is submitted in good faith and for good cause shown in accordance with NRAP 26(b).

Dated this 23rd day of December, 2019.

MARQUIS AURBACH COFFING

By /s/ Chad F. Clement
Chad F. Clement, Esq.
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10001 Park Run Drive
Las Vegas, Nevada 89145
*Attorneys for Appellant Parviz
SafariAppellant*

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE DOCKETING STATEMENT** was filed electronically with the Nevada Supreme Court on the 23rd day of December, 2019. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Kristine Kuzemka
Jonathan Blum
Scott Fleming
Andrew Flahive

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N/A

/s/ Jared M. Moser, Esq.
An employee of Marquis Aurbach Coffing