### Case Nos. 80427 & 80831

# In the Supreme Court of Nevada

In the Matter of the Petition of CLA PROPERTIES LLC.

SHAWN BIDSAL,

Appellant,

vs.

CLA PROPERTIES LLC,

Respondent.

CLA PROPERTIES LLC,

Appellant,

vs.

SHAWN BIDSAL,

Respondent.

### Electronically Filed Sep 23 2020 10:06 a.m. Elizabeth A. Brown Clerk of Supreme Court

## MOTION FOR EXTENSION TO FILE OPENING BRIEF AND APPENDIX

Shawn Bidsal requests an extension of 30 days, through October 23, 2020, to file his opening brief and appendix. NRAP 31(b)(3). This is the first such motion. The parties previously stipulated to a briefing schedule with an original deadline of September 24, 2020.

Counsel for CLA Properties LLC has courteously agreed not to oppose this request.

The requested extension is necessary under the circumstances. The attorney assigned to draft the opening brief had to unexpectedly devote substantial time to assisting his wife with the final steps of her doctoral project after the individual hired to provide that assistance did not follow through.

In addition, counsel have had extraordinary professional demands, including having to prepare for two oral arguments in this Court within a week of one another.

Finally, counsel unexpectedly had to divert attention from this brief to respond to a last-minute motion to reopen a judgment that, following answers to certified questions from this Court, had been finally resolved in the Ninth Circuit.

Counsel aims to file the reply as soon as possible and appreciates this Court's courtesy in considering this extension

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Dated this 23rd day of September, 2020.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: <u>/s/Abraham G. Smith</u>

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## **CERTIFICATE OF SERVICE**

I certify that on September 23, 2020, I submitted the foregoing "Motion for Extension to File Opening Brief and Appendix" for filing via the Court's eFlex electronic filing system. Electronic notification will be

sent to the following:

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