

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

JOE N. BROWN, an individual,

Appellant,

vs.

GNL, CORP., a Nevada corporation,  
and THYSSENKRUPP ELEVATOR  
CORPORATION, a foreign corporation,

Respondents.

Case Nos. 80581 and 81151

District Court Case No. A739887 Filed  
May 15 2020 12:46 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**MOTION TO CONSOLIDATE**  
**CASE NOS. 80581 AND 81151**

COMES NOW Appellant Joe N. Brown, by and through his counsel of record Mohamed A. Iqbal, Jr., and, pursuant to NRAP 3(b)(2), respectfully moves this Honorable Court to consolidate the appeals pending before it and docketed at case nos. 80581 and 81151 (this “Motion”). In support of this Motion, Appellant avers as follows:

1. On February 8, 2020, Appellant filed a Notice of Appeal following the January 9, 2020 Entry of Judgment in case no. A739887 before Department XXXI and the Honorable Joanna S. Kishner of the Eighth Judicial District Court, Clark County, Nevada (the “District Court”). The appeal was docketed with this Court at case no. 80581 (the “First Appeal”).
2. On May 5, 2020, Appellant filed a separate Notice of Appeal following the

April 6, 2020 Notice of Entry of Order in the District Court. The appeal was docketed with this Court at case no. 81151 (the “Second Appeal”).

3. The First Appeal and the Second Appeal arise from the same underlying case and are thus inter-related. In the First Appeal, the District Court entered a defense verdict on Appellant’s negligence claim following a multi-week jury trial. In the Second Appeal, the District Court granted Respondents’ respective motions for attorneys’ fees associated with that jury trial and the runup thereto.

4. Pursuant to NRAP 3(b)(2), Appellant respectfully requests that the above-referenced appeals be consolidated. Rule 3(b)(2) provides that “[w]hen the parties have filed separate timely notices of appeal, the appeals may be joined or consolidated by the court upon its own motion or upon motion of a party.” NRAP 3(b)(2).

5. The consolidation of the First Appeal and the Second Appeal will: (i) allow the parties and this Court to avoid duplicative briefs and appendices; (ii) ease the burden on all parties and the Court alike; and (iii) ensure the conservation of valuable judicial resources and streamline these proceedings.

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WHEREFORE, Appellant respectfully requests that this Honorable Court enter an Order granting this Motion.

Dated May 15, 2020

Respectfully Submitted,

**IQBAL LAW PLLC**



MOHAMED A. IQBAL, JR.

Nevada Bar No. 10623

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*Attorneys for Appellant Joe N. Brown*

**CERTIFICATE OF SERVICE**

I certify that I am an employee of IQBAL LAW PLLC and that on May 15, 2020, I caused a true and correct copy of the **MOTION TO CONSOLIDATE CASE NOS. 80581 AND 81151** to be served as follows:

\_\_\_ By placing the same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada; and/or

\_\_\_ Pursuant to NEFCR 9, to be sent via facsimile; and/or

X Pursuant to NEFCR 9, by transmitting via the Court's electronic filing services by the document(s) listed above to the Counsel set forth on the service list.

/s/ Marie-Claire Alsanjakli

An Employee of **IQBAL LAW PLLC**