

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.

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Elizabeth A. Brown
Clerk of Supreme Court

MOTION FOR EXTENSION TO FILE OPENING BRIEF AND APPENDIX

Shawn Bidsal requests an extension of through November 24, 2020, to file his opening brief and appendix. NRAP 31(b)(3). This is the second such motion. The parties previously stipulated to a briefing schedule with an original deadline of September 22, 2020, which was extended by motion to October 23, 2020.

The requested extension is necessary under the circumstances. Lead appellate counsel has had to prepare for three oral arguments before the *en banc* Court, including two that were just scheduled two

weeks ago and that were scheduled to be argued back-to-back: first in *American Access Casualty Company v. Cruz* (Docket No. 75424) on November 2; then in *Teva Parenteral Medicines, Inc. v. Eighth Judicial District Court* (Docket No. 81024) on November 3. One of those cases settled just yesterday, but those settlement discussions actually took additional time from the preparation of this brief. The requested extension is necessary to give counsel the opportunity to prepare for the remaining argument on November 3 and then turn to the drafting of this opening brief.

In addition, appellate counsel has struggled with several staffing issues. One of the attorneys primarily responsible for the drafting of the opening brief unexpectedly had to take time to deal with his family's health and to assist his wife with the completion of a doctoral project, which is now in its final days. At various times, his daughter has been ill and, in the absence of other child care at this time, counsel had to take primary responsibility to give his wife the opportunity to prepare for her final recitals. Appellate counsel had difficulty finding another attorney with capacity to handle this complex appeal. Counsel has now

made that reassignment and expects to expeditiously complete work on the draft.

Counsel appreciate this Court's courtesy in these extraordinary circumstances.

Dated this 23rd day of October, 2020.

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CERTIFICATE OF SERVICE

I certify that on October 23, 2020, I submitted the foregoing “Motion for Extension” for filing via the Court’s eFlex electronic filing system. Electronic notification will be sent to the following:

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