

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.

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Clerk of Supreme Court

**REPLY BRIEF ON MOTION FOR EXTENSION
TO FILE OPENING BRIEF AND APPENDIX**

Respondent CLA Properties, LLC’s opposition to the motion for extension trots out a parade of accusations, none with citations to the record or any other evidence. According to CLA, appellant Shawn Bidsal wrongfully remains in control of the properties at issue and purportedly has “retribution motivations to let the properties run down and fall into disrepair.” (Opp. 4.) While Bidsal strongly disagrees with CLA’s characterizations, they are also beside the point because any question with regard to execution on the first arbitration award (on appeal here) or

the ongoing second arbitration is not for this Court. This Court’s task is to evaluate the propriety of the first arbitration award. And while the standard of review is deferential in the abstract, even deferential review is not the same as *no* review: without adequate proof of “each element of the” claims, an arbitrator’s arbitrary and capricious award will be vacated. *Wichinsky v. Mosa*, 109 Nev. 84, 90, 847 P.2d 727, 731 (1993).

To its credit, CLA does not dispute the legitimacy of Bidsal’s request for an extension. The circumstances detailed in the motion, including a major—and late-scheduled—oral argument that just concluded yesterday, are genuine and merit the requested extension. Counsel are working diligently to complete the brief and ask this Court’s courtesy in granting the extension.

Dated this 4th day of November, 2020.

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CERTIFICATE OF SERVICE

I certify that on November 4, 2020, I submitted the foregoing “Reply Brief on 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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