Case Nos. 80427 & 80831

In the Supreme Court of Nevada

CLA Properties LLC.	May 24 2021 04:52 p.m. Elizabeth A. Brown Clerk of Supreme Court
SHAWN BIDSAL,	
Appellant,	
vs.	
CLA PROPERTIES LLC,	
Respondent.	

CLA PROPERTIES LLC,

In the Matter of the Petition of

Appellant,

vs.

SHAWN BIDSAL,

Respondent.

No. 80831

No. 80427

Flectronically Filed

MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF ON APPEAL AND ANSWERING BRIEF ON CROSS-APPEAL

Shawn Bidsal requests an extension through June 23, 2021, to file his reply brief on appeal and answering brief on cross-appeal. NRAP 31(b)(3). This is the third such motion. The parties previously stipulated to extend the original deadline from March 24, 2021, to April 23, 2021, and this Court granted Mr. Bidsal's unopposed motion to extend the deadline from April 23, 2021 to May 24, 2021.

Counsel have prepared a draft brief, but there is an extreme need for this extension. The attorney primarily responsible for the reply brief and answering brief on cross-appeal lost time due to an illness, and has needed time to recover and catch up. Another attorney working on the brief has also had to take time away dealing with a family emergency due a serious complication in his wife's pregnancy. Unfortunately, this medical issue is likely to require the attorney to take over much of the responsibilities at home for the latter part of the pregnancy, so it may take time for counsel to either find another individual to work on the matter or for that attorney to find time to prepare the brief. Lead appellate counsel has also been unable in the meantime to devote significant time to this appeal because of the press of preparing for two Supreme Court arguments on the same day.

Additionally, Mr. Bidsal has been required to travel for business and prepare for depositions in other matters, limiting his availability to review drafts and confer with appellate counsel regarding the reply brief and answering brief on cross-appeal.

We appreciate the Court's understanding in these extraordinary circumstances.

Dated this 24th day of May, 2021.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

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

Daniel F. Polsenberg (SBN 2376) Joel D. Henriod (SBN 8492) Abraham G. Smith (SBN 13250) 3993 Howard Hughes Parkway, Suite 600 Las Vegas, Nevada 89169 (702) 949-8200

JAMES E. SHAPIRO (SBN 7907) AIMEE M. CANNON (SBN 11780) SMITH & SHAPIRO, PLLC 3333 E. Serene Ave., Suite 130 Henderson, Nevada 89074 (702) 318-5033

Attorneys for Shawn Bidsal

CERTIFICATE OF SERVICE

I certify that on May 24, 2021, I submitted the foregoing "Motion for Extension of Time to File Reply Brief on Appeal and Answering Brief on Cross-Appeal" for filing via the Court's eFlex electronic filing system. Electronic notification will be sent to the following:

Louis E. Garfinkel
REISMAN SOROKAC
LEE
8965 S. EASTERN AVE., STE. 382
LAS VEGAS, NV 89123
The
(702) 727-6258
Ref

Robert L. Eisenberg Lemons, Grundy & Eisenberg 6005 Plumas Street Third Floor Reno, Nevada 89519

Attorneys for CLA Properties LLC

/s/Cynthia Kelley

An Employee of Lewis Roca Rothgerber Christie LLP