

IN THE SUPREME COURT OF THE STATE OF NEVADA

JSJBD CORP. D/B/A BLUE DOG'S PUB;
STUART VINCENT, AN INDIVIDUAL;
JEFFREY B. VINCENT, AN
INDIVIDUAL; AND JEFF WHITE, AN
INDIVIDUAL,

Appellants/Cross-Respondents,

vs.

TROPICANA INVESTMENTS, LLC, A
CALIFORNIA LIMITED LIABILITY
COMPANY,

Respondent/Cross-Appellant.

Electronically Filed
Oct 02 2020 10:54 a.m.
Elizabeth A. Brown
Clerk of Supreme Court
Case No.: 80849

Appeal from the Eighth Judicial
District Court, the Honorable
Elizabeth Gonzalez Presiding

MOTION FOR EXTENSION OF TIME TO FILE
RESPONDENT/CROSS-APPELLANT'S ANSWERING BRIEF ON
APPEAL AND OPENING BRIEF ON CROSS-APPEAL

(First Request)

Marquis Aurbach Coffing

Terry A. Moore, Esq.

Nevada Bar No. 7831

Collin M. Jayne, Esq.

Nevada Bar No. 13899

10001 Park Run Drive

Las Vegas, Nevada 89145

Telephone: (702) 382-0711

Facsimile: (702) 382-5816

tmoore@maclaw.com

cjayne@maclaw.com

Attorneys for Respondent/Cross-Appellant,

Tropicana Investments, LLC

MAC:08732-032 4161447_1

Respondent/Cross-Appellant, Tropicana Investments, LLC (“Tropicana”), by and through its counsel of record, Marquis Aurbach Coffing, hereby moves this Court pursuant to NRAP 31(b) for a 30-day extension of time to file its answering brief on appeal and opening brief on cross-appeal.

Tropicana’s answering brief on appeal and opening brief on cross-appeal is currently due on October 5, 2020. This is Tropicana’s first request for an extension of time. If this Court grants this request for a 30-day extension, Tropicana’s answering brief on appeal and opening brief on cross-appeal will be due on November 4, 2020. Good cause exists for allowing Tropicana to extend the filing deadline until November 4, 2020:

1. In the time since the opening brief was filed, counsel for Tropicana has had three mediations, in multiple jurisdictions, each of which necessitated in-depth briefing and full-day time commitments;
2. Counsel is also in the midst of preparing several cases for trial in the coming months;
3. Additionally, counsel’s practice primarily focuses on landlord-tenant real estate matters, and, thus, in addition to providing written and public comment on ADKT 567, he has been exceptionally busy advising clients on the state of the constantly evolving various governmental edicts regarding evictions;

4. Appellants/Cross-Respondents' opening brief also raised a number of issues on appeal that were not raised below, and additional time is needed to address each new argument;

5. Finally, Appellants/Cross-Respondents left necessary documents, including trial exhibits, out of their appendix, and Tropicana has been required to comb through the record to make sure this Court has a complete appendix of documents pertinent to the issues on appeal/cross-appeal.

This Motion is submitted in good faith and for good cause shown in accordance with NRAP 31(b). Therefore, Tropicana respectfully requests that this Court grant its motion for a 30-day extension of time to file its answering brief on appeal and opening brief on cross-appeal until November 4, 2020.

Dated this 2nd day of October, 2020.

MARQUIS AURBACH COFFING

By /s/ Collin M. Jayne

Terry A. Moore, Esq.
Nevada Bar No. 7831
Collin M. Jayne, Esq.
Nevada Bar No. 13899
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorneys for Respondent/Cross-
Appellant, Tropicana Investments, LLC

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT/CROSS-APPELLANT'S ANSWERING BRIEF ON APPEAL AND OPENING BRIEF ON CROSS-APPEAL** was filed electronically with the Nevada Supreme Court on the 2nd day of October, 2020. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Mario Lovato, Esq.

/s/ Leah Dell _____
Leah Dell, an employee of
Marquis Aurbach Coffing