

IN THE SUPREME COURT OF THE STATE OF NEVADA

JSJBD CORP, d/b/a Blue Dogs Pub, a)	Case No.: 80849
Nevada corporation, STUART VINCENT,)	
JEFFREY VINCENT, and JEFF)	(Dist. Ct. No. A-18-783311-B)
WHITE)	
)	
Appellants,)	
)	
vs.)	
)	
TROPICANA INVESTMENTS, LLC, a)	
California limited liability company,)	
)	
Respondent.)	
_____)	
)	
AND CROSS-APPEAL.)	
_____)	

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Elizabeth A. Brown
Clerk of Supreme Court

**APPELLANTS / CROSS-RESPONDENTS' MOTION FOR EXTENSION /
LEAVE TO FILE COMPLETED REPLY BRIEF AND ANSWERING
BRIEF ON CROSS-APPEAL**

Pursuant to Nevada Rule of Appellate Procedure 26(b), and otherwise, Appellants / Cross-Respondents (collectively, "JSJBD Corp.") requests an extension, and leave, for filing Appellants / Cross-Respondents' Reply Brief And Answering Brief on Cross-Appeal ("Reply / Answering Brief"), which is complete and is being submitted along with this Motion.

Good cause exists to grant the extension and allow the filing of the Reply / Answering Brief. The deadlines in this appeal have changed, and been extended, for both sides in this Appeal / Cross-Appeal. Both sides have submitted lengthy and

detailed initial briefing on the issues. JSJBD Corp. requested, and obtained, an extension for the Opening Brief and the filing of approximately 3,500 pages of Appendix that provide the record in this appeal. Defendant Tropicana Investments, LLC obtained a month-long extension for filing the Answering Brief, along with several hundred supplemental pages of Appendix. Neither side has objected to extension requests in this appeal, and none is expected.

This is the final brief for JSJBD Corp. This brief required submission of both its reply arguments in support of its Opening Brief, as well as the Answering Brief to Tropicana Investments' over 80-pages of briefing on Cross-Appeal. This case involved substantial litigation before the district court, leading up to a five-day trial that occurred in the district court in November of 2019. JSJBD Corp.'s Reply / Answering Brief complies with this Court's length and other requirements while also including references throughout to various parts of the 3,453 pages of Appendix submitted by JSJBD Corp., as well as several hundred additional pages of Appendix submitted by Tropicana Investments. The indexing and cross-references were time-consuming, and have now been finalized. Additional tables and cross-referencing have been finalized in the Reply / Answering Brief.

Rather than make a late request without the finalized brief in question, Plaintiff-Appellant JSJBD Corp. seeks to make the present request with the finalized

Reply / Answering Brief, thereby showing that such briefing has been completed and that there will be no further request for extension.

The briefing has been finalized during a period involving holidays and conflicting obligations. The Reply / Answering Brief is otherwise submitted in accordance with the rules of appellate procedure. It involved time-consuming efforts, and, because it is properly drafted, presents proper and compelling arguments.

The policy of hearing matters on their merits is present in this case, and no prejudice has been visited upon any parties, especially in light of the trial that occurred, the stay of proceedings during the Court-mandated settlement conference process that the parties attended in good faith, and the fact that JSJBD Corp. initiated the appeal process and has a strong interest in moving the matter to final determination. The present Reply / Answering Brief provides legal arguments that will allow the Court and the parties to otherwise efficiently review the legal questions in this case.

Plaintiff-Appellant JSJBD Corp. respectfully requests the extension, and leave to file, Reply / Answering Brief that concludes its briefing in this matter.

DATED: December 31, 2020.

LOVATO LAW FIRM, P.C.

/s/ Mario Lovato
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CERTIFICATE OF SERVICE

I hereby certify that, on December 31, 2020, I submitted **APPELLANTS' MOTION FOR EXTENSION OF TIME TO FILE THE COMPLETED OPENING BRIEF AND APPENDIX** for service via electronic service to the parties registered for service with the Nevada Supreme Court in this matter, including the following:

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 /s/ Mario Lovato
An employee of Lovato Law Firm, P.C.