

IN THE SUPREME COURT OF THE STATE OF NEVADA

RUTH L. COHEN, AN INDIVIDUAL,

APPELLANT,

VS.

PAUL S. PADDA, AN INDIVIDUAL;
PAUL PADDA LAW, PLLC, A NEVADA
PROFESSIONAL LIMITED LIABILITY
COMPANY,

RESPONDENTS.

Electronically Filed
Mar 17 2021 05:29 p.m.
Elizabeth A. Brown
Clerk of Supreme Court
Case No. 81018

**MOTION FOR EXTENSION OF TIME BY SABA-LV, VIPI
AND JAY BLOOM TO FILE MOTION FOR LEAVE TO FILE
AMICUS BRIEF IN SUPPORT OF RESPONDENTS**

Pursuant to Nevada Rule of Appellate Procedure (“NRAP”) 26, proposed *amici curiae*, South Asian Bar Association of Las Vegas (“SABA-LV”), Veterans in Politics International, Inc. (“VIPI”) and Jay Bloom (an individual) respectfully request this Court grant them a 30-day extension of time (commencing following the issuance of a Court Order if this request is granted) to file their motion for leave to file an amicus brief and a proposed amicus brief.

Under NRAP 29(a), “[a]ny other amicus curiae,” apart from a governmental party, “may file a brief only by leave of court granted on motion.” An amicus curiae must file its brief accompanied by a motion for leave “no later than 7 days after the brief of the party being supported is filed.” *See* NRAP 29(f). The Court, however, “may grant leave for later filing.” *Id.* And such leave may be granted for “good cause.” NRAP 26(b)(1)(A).

In this appeal, the Respondents, Paul S. Padda (an individual) and Paul Padda Law, PLLC, filed their Answering Brief on March 10, 2021. The amici curiae identified herein wish to support the legal positions articulated in Respondents’ Answering Brief, which implicate issues of public importance. Thus, their proposed amicus brief with a motion seeking leave to file such a brief would be due on March 17, 2021. This is amici curiae’s first request for an extension. No requests for additional time have been denied or denied in part.

There is good cause to grant this request based upon the following:

1. Counsel for the amici identified herein will need time to familiarize himself with the record and the briefing before the Court.

2. This is a case involving issues of legal ethics and lawyer discipline, namely whether a lawyer can fee-split with a non-lawyer. Both SABA-LV and VIPI (and potentially other community organizations that may join the amicus brief at the time the motion for leave and the proposed brief are filed with the Court) represent the public interest in matters involving legal ethics and lawyer discipline. Jay Bloom, a former member of the State Bar of Nevada Attorney Disciplinary Committee, is a member of the public that has an interest in legal ethics and lawyer discipline and, therefore, this case. As previously noted by this Court, the Nevada Rules of Professional Conduct governing attorney suspension/disbarment (e.g. discipline) exist to protect the public. *See State Bar of Nevada v. Clairborne*, 104 Nev. 115 (1998). All three amici represent the interests of the public.

3. In light of the reasons set forth in the preceding paragraphs, good cause exists to permit other community-based organizations (including voluntary bar organizations) to review the amici's draft brief and join in that brief.

The amici identified herein respectfully request the Court grant this motion which is supported by good cause. Should the Court grant this motion, amici respectfully request that their requested extension of 30-days to file a motion and proposed brief commence on the day following the issuance of an Order granting this motion.

Respectfully submitted,

/s/ Milan Chatterjee

Milan Chatterjee, Esq.
Nevada Bar No. 15159
SABA-LV
4030 South Jones Blvd., #30370
Las Vegas, Nevada 89173
Tele: (702) 538-3749

Attorney for Amici Curiae
SABA-LV, VIPI and Jay Bloom

Dated: March 17, 2021

CERTIFICATE OF SERVICE

I hereby certify that on this day, March 17, 2021, the foregoing
**MOTION FOR EXTENSION OF TIME BY SABA-LV, VIPI
AND JAY BLOOM TO FILE MOTION FOR LEAVE TO FILE
AMICUS BRIEF IN SUPPORT OF RESPONDENTS** was filed with
the Supreme Court of Nevada through its electronic filing system.
Service of the foregoing document shall be made in accordance with the
Master Service List upon all registered parties and/or participants and
their counsel.

/s/ Milan Chatterjee

Milan Chatterjee, Esq.