

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.)
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Electronically Filed
Mar 30 2021 06:24 p.m.
Elizabeth A. Brown
Clerk of Supreme Court
Case No. 81018

**REPLY IN SUPPORT OF SABA-LV, VIPI AND JAY BLOOM’S
MOTION FOR LEAVE TO FILE AMICUS BRIEF**

Pursuant to Nevada Rule of Appellate Procedure (“NRAP”) 27(a)(4), proposed *amici curiae*, South Asian Bar Association of Las Vegas (“SABA-LV”), Veterans in Politics International, Inc. (“VIPI”) and Jay Bloom (an individual) hereby file this Reply to Ruth Cohen’s March 23, 2021 Opposition to amici’s motion for leave.

Simply stated, Ms. Cohen’s Opposition is both premature and without merit. At this juncture, amici are simply asking for an extension

of time for leave to file both a motion and a brief pursuant to NRAP 29.

The plain language of NRAP 29 permits a party to seek leave to file an amicus brief with the Court's permission. While amici have not yet filed their proposed brief and supporting motion, Ms. Cohen opposes their intent to do so by arguing that amicus briefs will not aid the Court.

Given that Ms. Cohen cannot possibly be basing her arguments on having reviewed the proposed brief, her opposition is both premature and without merit. Indeed, without merit because it is based only upon speculation and opinion.

Ms. Cohen also argues that permitting amici to participate in this appeal will delay proceedings and that the lower court granted her an expedited trial setting. This is a point of no consequence. The lower court also dismissed Ms. Cohen's case so there is no pending trial date.

The amici identified herein are not supporting a party per se but instead supporting certain legal principles implicated in this case that will impact the larger community. The amici will bring a unique perspective to this appeal, including citation to legal authorities, that addresses the concerns of the larger public.

For the reasons set forth herein, the amici respectfully request the Court grant their March 17, 2021 motion for additional time to file the motion and brief identified under NRAP 29.

Respectfully submitted,

/s/ Milan Chatterjee

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

Dated: March 30, 2021

CERTIFICATE OF SERVICE

I hereby certify that on this day, March 30, 2021, the foregoing
**REPLY IN SUPPORT OF SABA-LV, VIPI AND JAY BLOOM’S
MOTION FOR LEAVE TO FILE AMICUS BRIEF** 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.