

The Powell Law Firm

Tom W. Stewart, Esq.

Nevada Bar No. 14280

8918 Spanish Ridge Avenue, #100

Las Vegas, Nevada 89148

Telephone: (702) 728-5500

tom@tplf.com

Electronically Filed
Feb 12 2021 02:39 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

IN THE SUPREME COURT OF THE STATE OF NEVADA

PARVIZ SAFARI, an individual;
MANDANA ZAHEDI, an individual;
AND NOOSHIN ZAHEDI, an
individual,

Appellants,

vs.

HAMID MODJTAHED, an
individual; and MOHAMMAH
MODJTAHED, an individual,

Respondents.

Docket No. 82279

**MOTION FOR EXTENSION OF
TIME TO FILE DOCKETING
STATEMENT**

(First Written Request)

Respondents Parviz Safari, Mandana Zahedi, and Nooshin Zahedi hereby move for a three-day extension of time to file their docketing statement, which is attached to this motion. The docketing statement was due February 9, 2021, but, due to an inadvertent calendaring error, was not timely filed. If the court grants the motion, the docketing statement will be due today, February 12, 2021.

Good cause exists for allowing appellants to extend the filing deadline for the docket statement for the following reasons:

1. The untimeliness of the docketing statement was solely caused by a calendaring error which showed the docketing statement due today, as opposed to February 9, 2021.

2. The docketing statement is now complete and is attached to this motion for the court's review.

3. The litigation at issue spans half a decade and resulted in millions of dollars in damages being assessed; the docketing statement accurately traces that procedural history and describes the complex issues on appeal.

4. This motion is submitted in good faith and for good cause shown in accordance with NRAP 26(1)(a). For the foregoing reasons, appellants respectfully request a three-day extension of time to file the docketing statement.

Dated this 12th day of February 2021.

The Powell Law Firm

/s/ Tom W. Stewart
Tom W. Stewart, Esq.
Nevada Bar No. 14280

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing **MOTION FOR EXTENSION OF TIME TO FILE DOCKETING STATEMENT** with the Nevada Supreme Court on the 12th day of February 2021. Electronic Service of the document shall be made in accordance with the Master Service List as follows:

Jonathan Blum, Esq.
Eric D. Walther, Esq.

/s/ Tom W. Stewart
An Employee of The Powell Law Firm

Exhibit 1