

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 MOHAMMAD
MOJTAHED, AN INDIVIDUAL,

Respondents.

Supreme Court No. ~~82279~~ Electronically Filed
Feb 23 2021 10:21 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

RESPONSE TO DOCKETING STATEMENT

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RESPONSE TO DOCKETING STATEMENT

Appellant's docketing statement contains several objective inaccuracies. First, the trial lasted 18 days, not 16. That is not including the punitive damages hearing, which would make the trial 19 days. This error is material because the Appellants ordered the trial transcripts for each day of trial except the two days where Appellant Parviz Safari testified. Those two days of testimony are highly relevant to the issues on appeal. Second, Appellants' list of issues on appeal includes several summary judgment rulings. However, Appellant did not check "Summary judgment," in section 4 of the docketing statement. Appellant also checked "Grant/Denial of NRCP 60(b) relief" in section 4 even though no NRCP 60(b) motion was filed in the district court. These errors are material because Appellant could not articulate what exactly is being appealed when the parties held a meet-and-confer on transcripts. Third, Exhibit 12 to the docketing statement is incomplete, as it only lists the derivative counterclaims on behalf of Meditex, not the individual claims. Respondents asked Appellants to correct these errors in the docketing statement but Appellants did not respond.

Dated: February 23, 2021

BROWNSTEIN HYATT FARBER SCHRECK, LLP

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed and served the foregoing **RESPONSE TO DOCKETING STATEMENT** with the Clerk of the Court of the Supreme Court of Nevada by using the Court's Electronic Filing System on February 23, 2021.

/s/ Michelle Tuason
an employee of Brownstein Hyatt Farber Schreck,
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