

**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](mailto:tom@tplf.com)

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Elizabeth A. Brown  
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**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 RESPONSE TO  
ORDER TO SHOW CAUSE**

**(First Written Request)**

Appellants Parviz Safari, Mandana Zahedi, and Nooshin Zahedi move pursuant to NRAP 26(1)(a) for a 30-day extension to file their response to the pending order to show cause. The Court previously granted a 14-day telephonic extension of time for appellants to file their response, which is currently due June 3, 2021. If the Court grants this motion, the response will be due July 5, 2021. For the following reasons, good cause exists for allowing appellants to extend the filing deadline of the response for 30 days:

1. This appeal presents complex questions arising out of litigation that spanned six years, 18 days of trial, a punitive damages hearing, and post-trial motion work. The record below consists of thousands of pages of documents which have required a substantial amount of time to review and summarize in preparing the response.

2. Counsel has worked diligently to prepare appellants' response, but, in order to concisely address this Court's concerns in the order to show cause, especially in light of the complexity of the record and the sheer number of claims and parties in this case, appellants will need the additional time to complete the response and circulate a draft.

3. Additionally, on May 17, 2021, Tom W. Stewart, Esq., appellants' counsel, welcomed his first child into the world, a happy, healthy baby girl. This wonderful development has placed sudden and unexpected demands on Mr. Stewart's schedule.

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Therefore, appellants respectfully request that this Court grant their motion and extend the deadline for response and appendix to July 5, 2021. This motion is submitted in good faith and for good cause shown in accordance with NRAP 26(b)(1)

Dated this 1st day of June 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 RESPONSE TO ORDER TO SHOW  
CAUSE (First Written Request)** with the Nevada Supreme Court on the 1st  
day of June 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