

**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. ~~81279~~ Electronically Filed  
Jun 01 2021 03:33 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**OPPOSITION TO APPELLANTS' MOTION FOR EXTENSION**

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## **OPPOSITION TO APPELLANTS' MOTION FOR EXTENSION**

Respondents Hamid Modjtahed and Mohammad Mojtaheh, by and through their undersigned counsel, hereby oppose Appellant's Motion for Extension of Time to File Response to Order to Show Cause.

This Court's April 20, 2021 Order to Show Cause required the Appellants to explain how the claims against UTSafety, LLC ("UTSafety") were resolved in the district court. On June 1, 2021, Respondents filed a response to this Court's Order to Show Cause that answered that question ("Response"). Specifically, the claims against UTSafety were voluntarily abandoned pursuant to EDCR 2.67(b)(4) in the Respondents' pretrial memorandum. *See* Pretrial Memorandum attached as **Exhibit 1** to Respondents' Response to Order to Show Cause, p. 11. Because it is undisputed how the claims against UTSafety were resolved in the district court, there is no need to grant Appellants a 30-day extension to explain what happened. Indeed, as set forth in Respondent's Response, this is just another attempt by Appellants to cause unreasonable delays in this case. Other examples include, among others: (1) filing a premature appeal in Case No. 79926 that was dismissed on June 23, 2020; and (2) refusing to pay for transcripts in this appeal in violation of NRAP 9.

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In any event, because the single question posed by this Court's Order to Show Cause has already been answered, there is no need to delay this case any longer. As a result, Appellants' Motion for Extension should be denied.

Dated: June 1, 2021

BROWNSTEIN HYATT FARBER SCHRECK, LLP

By: /s/ Eric D. Walther

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I electronically filed and served the foregoing **OPPOSITION TO APPELLANTS' MOTION FOR EXTENSION** with the Clerk of the Court of the Supreme Court of Nevada by using the Court's Electronic Filing System on June 1, 2021.

/s/ Wendy Cosby  
an employee of Brownstein Hyatt Farber Schreck,  
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