

The Powell Law Firm

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Electronically Filed
Aug 17 2021 04:26 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 MOHAMMAD
MODJTAHED, an individual,

Respondents.

Docket No. 82279

MOTION FOR EXTENSION OF
TIME TO PAY FOR
TRANSCRIPTS AND FILE NOTICE
PURSUANT TO NRAP 9

Appellants Parviz Safari, Mandana Zahedi, and Nooshin Zahedi move pursuant to NRAP 2 to extend the time for appellants to pay for the necessary portions of the transcript and to file the transcript request form pursuant to NRAP 9(a). Good cause exists to extend the deadline by 45 days because appellant Parviz Safari has recently obtained a loan that will allow him to finance this appeal, and the loan proceeds will be distributed to him on September 16, 2021, after which Safari will pay for the transcripts and file the transcript request form.

Allowing Safari an additional 45 days to request and pay for transcripts will have no impact on the parties' briefing schedule and will help the Court decide the case on its merits, which is its "basic underlying policy," *Hotel Last Frontier Corp. v. Frontier Properties, Inc.*, 79 Nev. 150, 155, 380 P.2d 293, 295 (1963), and will allow this appeal to be "pursued in a manner meeting high standards of diligence, professionalism, and competence." *Cuzdey v. State*, 103 Nev. 575, 578, 747 P.2d 233, 235 (1987). Accordingly, this Court should grant Safari a 45-day extension to request and pay for his transcripts and to file the notice of transcript request pursuant to NRAP 9(a).¹

Dated this 17th day of August 2021.

The Powell Law Firm

/s/ Tom W. Stewart
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¹ Consistent with this extension, the Court should grant the court recorder an extension to file the necessary notice under NRAP 9(c)(2).

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing **MOTION FOR EXTENSION OF TIME TO PAY FOR TRANSCRIPTS AND FILE NOTICE PURSUANT TO NRAP 9** with the Nevada Supreme Court on the 17th day of August 2021. Electronic Service of the document shall be made in accordance with the Master Service List as follows:

Jonathan Blum, Esq.
Eric Walther, Esq.
Adam Bult, Esq.

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