

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
Mar 15 2022 08:27 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE THE
ANSWERING BRIEF**

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**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE THE
ANSWERING BRIEF**

Pursuant to NRAP 31(b)(3), Respondents Hamid Modjtahed and Mohammad Mojtahed, by and through their undersigned counsel, hereby file this Unopposed Motion for an Extension of Time to File the Answering Brief. Appellants have no objection to the requested extension.

A. The current due date and the requested extension

Respondents' answering brief is currently due on March 28, 2022. The Respondents respectfully request a 60-day extension to file the answering brief, which would make it due on May 27, 2022.

B. Prior request for an extension

The Respondents received one prior 30-day extension pursuant to a stipulation filed on January 31, 2022. The Respondents have not had any requests for an extension denied.

C. There is good cause to grant the extension

Respondents are heavily involved with assisting counsel in preparing their answering brief. Unfortunately, however, Respondent Hamid Modjtahed had numerous medical procedures in February and March of 2022, including numerous vascular, foot, and head and neck surgeries. Mr. Modjtahed has additional medical procedures scheduled for April 2022. These medical procedures have severely limited

Respondents' ability to participate and assist counsel, which is necessary in this case given the large record and complicated issues presented.¹

It is also worth noting that Appellants received eight months of extensions to file their opening brief. Specifically, Appellants' opening brief was originally due on **April 26, 2021**. *See* January 26, 2021 Order Removing Case from Settlement Program. However, after receiving numerous extensions for various reasons, Appellants finally filed their opening brief on **January 26, 2022**. Given these extensions, it would be equitable to grant the Respondents a modest 60-day extension to file the answering brief, especially considering the aforementioned medical issues and the size of the district court record. Appellants do not object to the requested extension.

Dated: March 15, 2022

BROWNSTEIN HYATT FARBER SCHRECK, LLP

By: /s/ Eric D. Walther

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¹ The district court record includes extensive pre-trial and post-trial briefing and transcripts from 18 days of trial.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed and served the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE THE ANSWERING BRIEF** with the Clerk of the Court of the Supreme Court of Nevada by using the Court's Electronic Filing System on March 15, 2022.

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