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) Appeal No.: 82360
) Electronically Filed
) Jun 23 2021 05:30 p.m.
) Elizabeth A. Brown
) Eighth Judicial District Court
) Clerk of Supreme Court
) Case No.: A-17-756274-C

VS.

Respondents.

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1 been made on the same date that Notice of Appeal and Case Appeal Statement was
2 filed for the consolidated appeal.¹ The extension of time and consolidation would
3 serve judicial economy in the having all briefing brought in one appeal. The
4 extension for filing an Opening Brief would be for a period of 90 days after
5 docketing of the second appeal and consolidation. Should consolidation not occur,
6 Appellants would request 14 days to prepare an Opening Brief in the above-entitled
7 matter. Appellants assert for judicial economy that that good cause exists and that
8 the court may extend the time prescribed to perform any act, or may permit an act to
9 be done after that time expires. NRAP 26(b)(1). Appellants do not anticipate further
10 extensions being necessary after the instant Motion and bring this Motion only for
11 purposes of judicial economy pursuant to NRAP 3(b)(2).
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15 DATED this 23rd day of June, 2021.

16
17 CORY READE DOWS & SHAFER

18
19 By: /s/ R. Christopher Reade
20 R. CHRISTOPHER READE, ESQ.
21 Nevada Bar No. 006791
22 1333 North Buffalo Drive, Suite 210
23 Las Vegas, Nevada 89128
24 Telephone: (702) 794-4411
25 Facsimile: (702) 794-4421
create@crdslaw.com
Attorneys for Appellants NAVNEET
SHARDA and TRATA, INC.

26 ¹ Declaration of Counsel, attached as Exhibit "1"; June 23rd, 2021 Notice of
27 Appeal, attached as Exhibit "2"; June 23rd, 2021 Case Appeal Statement, attached as
28 Exhibit "3"

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■ NEFCR System (E-Flex) upon the following Parties in accordance with NEFCR 9 and 13:

Michael R. Mushkin, Esq.
MUSHKIN COPPEDGE
6070 South Eastern Avenue, Suite 270
Las Vegas, Nevada 89119
Attorneys for Respondents Steven Barket
and G65 Ventures LLC

Parties who are not registered users in accordance with NEFCR 9(d) a sealed envelope, postage prepaid to the following counsel and/or parties to this matter:

Personal Service upon the following users or their Counsel:

3

EXHIBIT “1”

EXHIBIT “1”

DECLARATION OF COUNSEL

R. CHRISTOPHER READE, ESQ., does declare as follows:

1. That Declarant represents Appellants NAVNEET SHARDA and TRATA INC in this matter.

2. That the subject of the instant an above-entitled appeal arises from an action brought before the Eighth Judicial District Court by Plaintiffs/ Respondents STEVEN BARKET and G65 VENTURES, LLC as against Appellants NAVNET SHARDA and TRATA INC. and against SHAFIK HIRJI, SHAFIK BROWN and FURNITURE BOUTIQUE arising out alleged agreement to finance a Furniture Fashions store. Counterclaims and cross-claims were filed between the respective parties.

3. That on December 14th, 2020, the District Court entered Findings of Fact, Conclusions of Law and Order dismissing Plaintiffs' claims with prejudice.

4. That Appellants filed the instant appeal but also filed a timely Motion to Alter or Amend and/or for Reconsideration with the District Court. Appellants sought reconsideration and/or alteration or amendment of the Order to clarify whether the dismissal was of Plaintiffs' claims only or dismissal of the entire action.

5. That the District Court denied the Motion to Alter or Amend through an Order entered May 25, 2021.

6. That on June 23rd, 2021, Appellants filed a timely Notice of Appeal after the May 25th, 2021 Order on the Motion to Alter or Amend. True and correct copies of the Notice of Appeal and Case Appeal Statement are filed herewith.

7. That as a result Appellants anticipate in the next few days that there will be separate timely notices of appeal from the same underlying orders between the same parties to the same action and thus that the appeals may be joined or consolidated by the court upon its own motion or upon motion of a party.

8. That good cause exists for consolidation of said appeals and thus an extension of time for filing the Opening Brief as between the appeals to be consolidated before this Court.

9. This request is not made for any dilatory purpose, but is necessary to protect the interests of judicial economy.

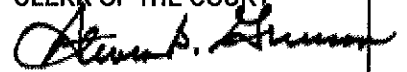
I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING
IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND
BELIEF.

DATED this 23rd day of June, 2021.

/s/ R. Christopher Reade, Esq.

EXHIBIT “2”

EXHIBIT “2”



NOA

R. CHRISTOPHER READE, ESQ.

Nevada Bar No. 006791

CORY READE DOWS AND SHAFER

1333 North Buffalo Drive, Suite 210

Las Vegas, Nevada 89128

Telephone: (702) 794-4411

Facsimile: (702) 794-4421

creade@crdslaw.com

Attorneys for NAVNEET SHARDA and TRATA INC.

DISTRICT COURT

CLARK COUNTY, NEVADA

STEVEN BARKET, an Individual; G65

VENUTRES LLC, a Nevada Limited

Liability Company,

Plaintiffs

v.

SHAFIK HIRJI, an Individual; SHAFIK

BROWN, an Individual; NAVNEET

SHARDA, an Individual; FURNITURE

BOUTIQUE LLC, a Nevada Limited

Liability Company; DOES I-X; and ROE

CORPORATIONS XI-XX, inclusive,

Defendants.

NAVNEET SHARDA, an individual;

TRATA INC., a Nevada Corporation,

Counterclaimants,

v.

STEVEN BARKET, an individual,

Counterdefendant.

Case No.: A-17-756274-C

Dept. No.: IV

Consolidated with:

Case No. A-18-770121-C

NOTICE OF APPEAL

1 NAVNEET SHARDA, an individual;)
 2 TRATA INC., a Nevada Corporation,)
 3 Counterclaimants,)
 4 v.)
 5 STEVEN BARKET, an Individual; SHAFIK)
 6 HIRJI, an Individual; SHAFIK BROWN, an)
 7 Individual; FURNITURE BOUTIQUE LLC,)
 8 a Nevada Limited Liability Company,)
 9 Counterdefendant.)
 10 MICHAEL AHDERS, an individual,)
 11 Plaintiff,)
 12 v.)
 13 BOULEVARD FURNITURE INC., a)
 14 Nevada Corporation, SHAFIK HIRJI, an)
 15 Individual; SHAFIK BROWN, an Individual,)
 16 Defendants.)

NOTICE OF APPEAL

18 NOTICE IS HEREBY GIVEN that Case A-17-756274-C Defendants/Counterclaimants
 19 NAVNEET SHARDA and TRATA INC., by and through their counsel R. CHRISTOPHER
 20 READE, ESQ. and the law firm of CORY READE DOWS & SHAFER, hereby appeal to the
 21 Nevada Supreme Court from the final Order for Dismissal of All Claims entered on December

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1 14th, 2020, as tolled by and including appeal from the Order Denying Motion to Alter or Amend
2 or for Reconsideration dated and May 25th, 2021.

3 DATED this 23rd day of June, 2021.

4 CORY READE DOWS AND SHAFER

5 By: /s/ R. Christopher Reade

6 R. Christopher Reade, Esq.

7 Nevada Bar No. 006791

8 1333 North Buffalo Drive, Suite 210

9 Las Vegas, Nevada 89128

10 (702) 794-4411

11 (702) 794-4421 Facsimile

12 creade@crdslaw.com

13 Attorneys for Defendants NAVNEET SHARDA and
14 TRATA INC.

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am a representative of CORY READE DOWS & SHAFER that on this 23rd day of June, 2020, I caused the foregoing NOTICE OF APPEAL to be served as follows:

☐ NEFCR System upon the following Parties in accordance with NEFCR 9 and 13:

Daniel Marks, Esq. LAW OFFICE OF DANIEL MARKS 610 South Ninth Street Las Vegas, Nevada 89101 Counsel for Shafik Hirji, Shafik Brown and Furniture Boutique LLC	Michael R. Mushkin, Esq. MUSHKIN COPPEDGE 6070 South Eastern Avenue, Suite 270 Las Vegas, Nevada 89119 Attorneys for Respondents Steven Barket and G65 Ventures LLC
Karen H. Ross, Esq. LAW OFFICE OF KAREN H ROSS 2275 Corporate Circle, Suite 160 Henderson, Nevada 89074 Co-Counsel for Appellants	Charles Barnabi, Esq. 375 E. Warm Springs Road #104 Las Vegas, Nevada 89119 Counsel for Michael Ahders

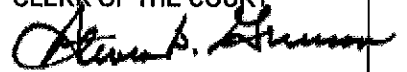
☐ First-Class United States mail, postage fully prepaid upon the following Parties who are not registered users in accordance with NEFCR 9(d) a sealed envelope, postage prepaid to the following counsel and/or parties to this matter:

Personal Service upon the following users or their Counsel:

/s/ Elizabeth Arthur
A Representative of Cory Reade Dows & Shafer

EXHIBIT“3”

EXHIBIT“3”



CAS
R. CHRISTOPHER READE, ESQ.
Nevada Bar No. 006791
CORY READE DOWS AND SHAFER
1333 North Buffalo Drive, Suite 210
Las Vegas, Nevada 89128
Telephone: (702) 794-4411
Facsimile: (702) 794-4421
creade@crdslaw.com
Attorneys for NAVNEET SHARDA and TRATA INC.

DISTRICT COURT

CLARK COUNTY, NEVADA

STEVEN BARKET, an Individual; G65)
VENUTRES LLC, a Nevada Limited) Case No.: A-17-756274-C
Liability Company,) Dept. No.: IV

Plaintiffs

v.

Consolidated with:
Case No. A-18-770121-C

SHAFIK HIRJI, an Individual; SHAFIK)
BROWN, an Individual; NAVNEET)
SHARDA, an Individual; FURNITURE)
BOUTIQUE LLC, a Nevada Limited)
Liability Company; DOES I-X; and ROE)
CORPORATIONS XI-XX, inclusive,)

CASE APPEAL STATEMENT

Defendants.

NAVNEET SHARDA, an individual;
TRATA INC., a Nevada Corporation,

Counterclaimants,

v.

STEVEN BARKET, an individual,

Counterdefendant.

1 NAVNEET SHARDA, an individual;)
 2 TRATA INC., a Nevada Corporation,)
 3 Counterclaimants,)
 4 v.)
 5 STEVEN BARKET, an Individual; SHAFIK)
 6 HIRJI, an Individual; SHAFIK BROWN, an)
 7 Individual; FURNITURE BOUTIQUE LLC,)
 8 a Nevada Limited Liability Company,)
 9 Counterdefendant.)
 10 MICHAEL AHDERS, an individual,)
 11 Plaintiff,)
 12 v.)
 13 BOULEVARD FURNITURE INC., a)
 14 Nevada Corporation, SHAFIK HIRJI, an)
 15 Individual; SHAFIK BROWN, an Individual,)
 16 Defendants.)

CASE APPEAL STATEMENT

1. Appellants filing this Case Appeal Statement:
 NAVNEET SHARDA and TRATA, INC.
2. Judge issuing the decision, judgment, or order appealed from:
 The Honorable Kerry Earley (retired)
 The Honorable Nadia Krall

....

....

....

- 1 3. Identify each appellant/cross-appellant and the name and address of counsel for each
2 appellant/cross-appellant:

3 NAVNEET SHARDA and TRATA, INC.
4 Counsel: R. Christopher Reade, Esq.
5 CORY READE DOWS & SHAFER
6 1333 North Buffalo Drive, Suite 210
7 Las Vegas, Nevada 89128
8 (702) 794-4411
9 Create@crdslaw.com
10 Counsel for Appellants

- 11 4. Identify each respondent and the name and address of appellate counsel, if known, for
12 each respondent (if the name of a respondent's appellate counsel is unknown, indicate
13 as much and provide the name and address of that respondent's trial counsel):

14 STEVEN BARKET and G65 VENTURES, LLC
15 Appellate Counsel: Michael Mushkin, Esq.
16 MUSHKIN COPPEDGE
17 6070 South Eastern Avenue, Suite 270
18 Las Vegas, Nevada 89119
19 Attorneys for Respondents Steven Barket and G65 Ventures LLC

20 SHAFIK HIRJI, SHAFIK BROWN and FURNITURE BOUTIQUE
21 Appellate Counsel: Daniel Marks, Esq.
22 LAW OFFICE OF DANIEL MARKS
23 610 South Ninth Street
24 Las Vegas, Nevada 89101
25 Counsel for Shafik Hirji, Shafik Brown and Furniture Boutique LLC

26 MICHAEL AHDERS
27 Counsel Charles Barnabi, Esq.
28 375 E. Warm Springs Road #104
Las Vegas, Nevada 89119
Counsel for Michael Ahders

Mr. Ahders is a party to the underlying District Court case in a consolidated action;
however none of the appealed claims are as against Mr. Ahders.

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1 5. Indicate whether any attorney identified above in response to question 3 or 4 is not
2 licensed to practice law in Nevada and, if so, whether the district court granted that
3 attorney permission to appear under SCR 42 (attach a copy of any district court order
4 granting such permission):

5 All attorneys are licensed in the State of Nevada.

6 6. Indicate whether appellant was represented by appointed or retained counsel in the
7 district court:

8 Appellants NAVNEET SHARDA and TRATA, INC. were represented by retained
9 counsel.

10 7. Indicate whether appellant is represented by appointed or retained counsel on appeal:

11 Appellants NAVNEET SHARDA and TRATA, INC. are represented by retained
12 counsel on appeal.

13 8. Indicate whether appellant was granted leave to proceed in forma pauperis, and the
14 date of entry of the district court order granting such leave:

15 Not applicable.

16 9. Indicate the date the proceedings commenced in the district court (e.g., date
17 complaint, indictment, information, or petition was filed):

18 Complaint filed June 1, 2017.

19 10. Provide a brief description of the nature of the action and result in the district court,
20 including the type of judgment or order being appealed and the relief granted by the
21 district court:

22 This was an action brought before the Eighth Judicial District Court by Plaintiffs/
23 Respondents STEVEN BARKET and G65 VENTURES, LLC as against Appellants NAVNET
24 SHARDA and TRATA INC. and against SHAFIK HIRJI, SHAFIK BROWN and FURNITURE
25 BOUTIQUE arising out alleged agreement to finance a Furniture Fashions store. Counterclaims
26 and cross-claims were filed between the respective parties. On December 14th, 2020, the Court
27 entered Findings of Fact, Conclusions of Law and Order dismissing Plaintiffs' claims with
28

1 prejudice. Appellants sought reconsideration and/or alteration or amendment of the Order to
2 clarify whether the dismissal was of Plaintiffs' claims only or dismissal of the entire action. The
3 District Court denied the Motion to Alter or Amend through an Order entered May 25, 2021.

4
5 11. Indicate whether the case has previously been the subject of an appeal to or original
6 writ proceeding in the Supreme Court and, if so, the caption and Supreme Court
docket number of the prior proceeding:

7 The underlying District Court case is presently the subject of an appeal docketed as
8 Supreme Court Case 82360, which was an appeal from the December 14th, 2020 Judgment. Case
9 82360 and this appeal should be consolidated pursuant to NRAP 3(b)(2).

10 12. Indicate whether this appeal involves child custody or visitation:

11 Not Applicable.

12
13 13. If this is a civil case, indicate whether this appeal involves the possibility of
settlement:

14 No. The parties have attempted an NRAP 16 Settlement Conference in Case 82360.

15
16 DATED this 23rd day of June, 2021.

17
18 CORY READE DOWS AND SHAFER

19
20 By: /s/ R. Christopher Reade

R. Christopher Reade, Esq.

Nevada Bar No. 006791

1333 North Buffalo Drive, Suite 210

Las Vegas, Nevada 89128

(702) 794-4411

(702) 794-4421 Facsimile

creade@crdslaw.com

21 Counsel for Appellants NAVNEET SHARDA and
22 TRATA, INC.
23
24
25
26
27
28

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am a representative of CORY READE DOWS & SHAFER that on this 23rd day of June, 2020, I caused the foregoing CASE APPEAL STATEMENT to be served as follows:

NEFCR System upon the following Parties in accordance with NEFCR 9 and 13:

Daniel Marks, Esq.
LAW OFFICE OF DANIEL MARKS
610 South Ninth Street
Las Vegas, Nevada 89101
Counsel for Shafik Hirji, Shafik Brown
and Furniture Boutique LLC

Michael R. Mushkin, Esq.
MUSHKIN COPPEDGE
6070 South Eastern Avenue, Suite 270
Las Vegas, Nevada 89119
Attorneys for Respondents Steven Barket and
G65 Ventures LLC

Karen H. Ross, Esq.
LAW OFFICE OF KAREN H ROSS
2275 Corporate Circle, Suite 160
Henderson, Nevada 89074
Co-Counsel for Appellants

Charles Barnabi, Esq.
375 E. Warm Springs Road #104
Las Vegas, Nevada 89119
Counsel for Michael Ahders

First-Class United States mail, postage fully prepaid upon the following Parties who are not registered users in accordance with NEFCR 9(d) a sealed envelope, postage prepaid to the following counsel and/or parties to this matter:

Personal Service upon the following users or their Counsel:

/s/ Elizabeth Arthur
A Representative of Cory Reade Dows & Shafer