

1 IN THE SUPREME COURT OF THE STATE OF NEVADA

2 NAVNEET SHARDA,
3 TRATA INC.,

Supreme Court Case No. 82360
Consolidated Case No. 83131

4 Appellant,

District Court Case No.: A-17-756274-C

5 v.

Electronically Filed
Oct 01 2021 02:01 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

6 STEVEN BARKET, AN INDIVIDUAL;
7 G65 VENTURES, LLC, A NEVADA
8 LIMITED LIABILITY COMPANY;
9 SHAFIK HIRJI, AN INDIVIDUAL;
10 SHAFIK BROWN, AN INDIVIDUAL;
11 AND FURNITURE BOUTIQUE, LLC,
12 A NEVADA LIMITED LIABILITY
13 COMPANY et. al.

14 Respondents.

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23 **MOTION FOR LEAVE TO EXCEED PAGE LIMITATION ON**
24 **RESPONDENTS' ANSWERING BRIEF**
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Attorneys for Respondents

1 COMES NOW Respondents, Shafik Hirji, Shafik Brown, and Furniture
2 Boutique, LLC, by and through their counsel, Daniel Marks, Esq., and Teletha Zupan,
3 Esq., of the Law Office of Daniel Marks and hereby submits their Motion for Leave
4 to Exceed Page Limitation on Respondents' Answering Brief in accordance with the
5 Nevada Rules of Appellate Procedure (hereafter "NRAP"), Rule 32(a)(7)(A)(i) and
6 (a)(7)(D). Respondents move this Court to extend the 30-page limitation on
7 Respondent's Answering brief to 33 pages. This Motion is made and based upon the
8 Memorandum of Points and Authorities set forth below, the record on appeal, and all
9 other papers and pleadings on file herein.

10 **MEMORANDUM OF POINTS AND AUTHORITIES**

11 This matter is on appeal from the Eighth Judicial District Court and involves
12 five cases that were litigated in various departments. In addition to explaining and
13 analyzing what occurred in the five cases, Respondents had to satisfy the other
14 requirements mandated by NRAP 28(b) and NRAP 32.

15 After preparing the Answering Brief, Respondents are unable to comply with
16 the 30 page limitation pursuant to NRAP 32 due to the extensive facts and required
17 analysis. Respondents substantially paired down the brief, but do not want to sacrifice
18 substance to comply with the page limitation, which could preclude a clear
19 understanding of the issues on appeal.

20 Respondents respectfully request for this Court to extend the 30 page limit for
21 their Answering Brief to 33 pages. There is good cause to grant the extension, which
22 will promote the proper administration of justice.

23 Dated this 1st day of October, 2021.

24 LAW OFFICE OF DANIEL MARKS

25 /s/ Teletha Zupan

26 DANIEL MARKS, ESQ.

Nevada State Bar No. 002003

27 TELETHA ZUPAN, ESQ.

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28 *Attorneys for Shafik Hirji, Shafik Brown, and
Furniture Boutique, LLC*

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I am an employee of the LAW OFFICES OF DANIEL
3 MARKS, and that on the 1st day of October, 2021, I did serve by way of
4 Electronic Filing a true and correct copy of the above and foregoing **Motion for**
5 **Leave to Exceed Page Limitation on Respondents’ Answering Brief**, as
6 follows:

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*Attorney for Appellants, Navneet
Sharda and Trata Inc.*

13 /s/ Teletha Zupan
14 An employee of the
15 LAW OFFICE OF DANIEL MARKS