

IN THE SUPREME COURT OF THE STATE OF NEVADA

NAVNEET SHARDA, an individual; ) Appeal No. : 82360  
TRATA, INC.; A Nevada corporation, ) Consolidated Case No. 83131  
 ) Electronically Filed  
 ) Oct 12 2021 09:17 a.m.  
Appellants, ) Elizabeth A. Brown  
 ) Clerk of Supreme Court  
vs. ) Eighth Judicial District Court  
 ) Case No.: A-17-756274-C  
STEVEN BARKET, an Individual; G65 )  
VENTURES LLC, SHAFIK HIRJI; )  
SHAFIK BROWN, an Individual; )  
FURNITURE BOUTIQUE LLC, a )  
Nevada Limited Liability Company; )  
DOES I-X; and ROE CORPORATIONS )  
XI-XX, inclusive, )  
Respondents. )

**APPELLANTS NAVNEET SHARDA AND TRATA, INC.'S  
LIMITED OPPOSITION TO MOTION TO STRIKE STEVEN BARKET'S  
JOINDER TO APPELLANTS' NAVNEET SHARDA AND TRATA, INC.'S  
OPENING BRIEF**

Appellants NAVNEET SHARDA and TRATA, INC. (collectively  
"Appellants" or "SHARDA") hereby file this Limited Opposition to Respondents  
Shafik Hirji, Shafik Brown, and Furniture Boutique, LLC's (collectively "Moving  
Respondents") Motion to Strike Steven Barket's Joinder to Appellants' Navneet  
Sharda and TRATA, Inc.'s Opening Brief.

**MEMORANDUM OF POINTS AND AUTHORITIES**

While Appellants do not take a position as to the merits of any arguments  
made by or in Respondent Steven Barket's Joinder to Appellants' Opening Brief,

1 Moving Respondents had made a series of veiled and not-so-veiled assertions and  
2 allegations that Appellant SHARDA lacks standing to appeal. Mot. 2:27-3:2.  
3 Appellants' standing to appeal a Judgment which purported to dismiss all of  
4 Appellants' claims without actually adjudicating any of Appellants' claims is clear.  
5 However Appellants' standing to appeal is outside of and beyond the scope of  
6 whether Respondent Barket's Joinder is proper or allowed under the Nevada Rules  
7 of Appellate Procedure. Moving Respondents have instead attempted to use their  
8 Motion as a supplemental response brief.  
9

11 The undisputed facts are that Moving Respondents received One Million Five  
12 Hundred Thousand Dollars (\$1,500,000.00) from Appellants. While collateral  
13 change in terms agreements which adjudicated, the underlying loans were never  
14 adjudicated. The underlying promissory notes predated the modification agreements  
15 and confessions of judgment about which Moving Respondents discuss. Moving  
16 Respondents brought a Motion to Dismiss of the first party claims but entered a  
17 judgment that dismissed all of the claims in the litigation even where not briefed to  
18 the Court.  
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1 Moving Respondents do get one allegation correct in their Motion to Strike  
2 and that is that the Judgment entered by the District Court is a mess that required  
3 timely appeal. Appellants filed two (2) appeals to ensure that the problems with the  
4 underlying judgment can be rectified by this Court through reversal and remand.  
5

6 DATED this 11<sup>th</sup> day of October 2021.

7 CORY READE DOWS & SHAFER  
8

9 By: /s/ R. Christopher Reade  
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18 SHARDA and TRATA, INC.  
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## **CERTIFICATE OF SERVICE**

I hereby certify that on the 11<sup>th</sup> day of October, 2021, I served a copy of the attached LIMITED OPPOSITION TO MOTION TO STRIKE STEVEN BARKET'S JOINDER TO APPELLANTS' NAVNEET SHARDA AND TRATA, INC.'S OPENING BRIEF by electronic service through the EFlex System to the following individuals:

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

|  |   |
|--|---|
| Daniel Marks, Esq.<br>LAW OFFICE OF DANIEL<br>MARKS<br>610 South Ninth Street<br>Las Vegas, Nevada 89101<br>Counsel for Shafik Hirji, Shafik<br>Brown and Furniture Boutique LLC | Michael R. Mushkin, Esq.<br>MUSHKIN COPPEDGE<br>6070 South Eastern Avenue, Suite 270<br>Las Vegas, Nevada 89119<br>Attorneys for Respondents Steven<br>Barket and G65 Ventures LLC<br><br>Charles Barnabi, Esq.<br>375 E. Warm Springs Road #104<br>Las Vegas, Nevada 89119<br>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/ Andrew M. David  
An Employee of Cory Reade Dows & Shafer