1	IN THE SUPREME COUR	RT OF THE STATE OF N	IEVADA	
2	NAVNEET SHARDA, TRATA INC.,	Supreme Court Case N Consolidated Case No.	o. 82360 83131	
3	Appellant,	District Court Case No.:	A-17-756274IC Filed	
4 5	v. STEVEN BARKET, AN INDIVIDU		Oct 01 2021 02:01 Elizabeth A. Brown	p.m.
6	STEVEN BARKET, AN INDIVIDUA G65 VENTURES, LLC, A NEVADA LIMITED LIABILITY COMPANY;	, \	Clerk of Supreme	
7	SHAFIK HIRJI, AN INDIVIDUAL; SHAFIK BROWN, AN INDIVIDUA	L;		
8	A NEVADA LIMITED LIABILITY COMPANY et. al.	С,		
9	Respondents.			
10 11	/			
12	<b>MOTION FOR LEAVE TO</b>	EXCEED PAGE LIMIT	TATION ON	
13	RESPONDENTS	S' ANSWERING BRIEF	-	
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22	I AW OFFICE OF DANIEL MADYS	1		
23 24	LAW OFFICE OF DANIEL MARKS DANIEL MARKS, ESQ. Nevada State Bar No. 002003			
24 25	office(a)danielmarks net			
23 26	Nevada State Bar No. 012660			
20 27	TELETHA ZUPAN, ESQ. Nevada State Bar No. 012660 tzupan@danielmarks.net 610 South Ninth Street Las Vegas, Nevada 89101 Attorneys for Respondents			
28	Attorneys for Respondents			

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

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## **MEMORANDUM OF POINTS AND AUTHORITIES**

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

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

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

Dated this 1st day of October, 2021.

## LAW OFFICE OF DANIEL MARKS

/s/ Teletha Zupan DANIEL MARKS, ESQ. Nevada State Bar No. 002003 TELETHA ZUPAN, ESQ. Nevada State Bar No. 012660 Attorneys for Shafik Hirji, Shafik Brown, and Furnitúre Boutique, LLC

## **CERTIFICATE OF COMPLIANCE**

- I hereby certify that this motion complies with the formatting requirements of NRAP 32(a)(4), the typeface requirements of NRAP 32(a)(5) and the type style requirements of NRAP 32(a)(6) because this motion has been prepared in a proportionally spaced typeface using WordPerfect in 14 point font and Times New Roman.
- Further, this motion complies with the word- or type-volume limitations and is proportionately spaced, has a typeface of 14 points or more and is less than 10 pages.
- 3. Finally, I hereby certify that I have read this motion, and to the best of my knowledge, information, and belief, it is not frivolous or interposed for any improper purpose. I further certify that it complies with all applicable Nevada Rules of Appellate Procedure. I understand that I may be subject to sanctions in the event that the accompanying motion is not in conformity with the requirements of the Nevada Rules of Appellant Procedure.

DATED this <u>1st</u> day of October, 2021.

## LAW OFFICE OF DANIEL MARKS

/s/ Teletha Zupan DANIEL MARKS, ESQ. Nevada State Bar No. 002003 TELETHA ZUPAN, ESQ. Nevada State Bar No. 012660 610 South Ninth Street Las Vegas, Nevada 89101 Attorneys for Respondents

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:		
7	Michael R. Mushkin, Esq.		
8	6070 S. Eastern Ave., Ste. 270 Las Vegas, Nevada 89119		
9	Attorney for Respondents, Steven Barket and G65 Ventures, LLC		
10	R. Christopher Reade, Esq. 1333 North Buffalo Drive, Ste. 210		
11 Las Vegas, Nevada 89128	Las Vegas, Nevada 89128		
12	Las Vegas, Nevada 89128 Attorney for Appellants, Navneet Sharda and Trata Inc.		
13	/s/ Teletha Zupan		
14	/s/ Teletha Zupan An employee of the LAW OFFICE OF DANIEL MARKS		
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