

IN THE SUPREME COURT OF THE STATE OF NEVADA

SFR INVESTMENTS POOL 1, LLC, a
Nevada Limited Liability Company,

Appellant,

vs.

JPMORGAN CHASE BANK, N.A.,

Respondent(s).

Case No. 83214

District Court Case No.

A-13-692304-C

Electronically Filed
Dec 28 2021 04:53 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

**OPPOSITION TO MOTION TO
STAY BRIEFING**

While Appellant SFR Investments Pool 1, LLC (“SFR”) knows a stay pending the motion may be in Respondent JPMorgan Chase Bank’s interest, it prejudices SFR and does nothing in the interest of judicial economy for this Court. SFR believes the Court should deny the motion out of hand and allow the case to proceed through full briefing rather than on summary affirmance. This is especially true where Chase’s motion addresses none of the case law cited in SFR’s Opening Brief. SFR should have an opportunity to reply to any argument Chase has with respect to that case law.

Instead, Chase refuses to address the case law and change the order of the Parties’ right to final argument. Put simply, SFR, as appellant currently has the right to last word following Chase’s answering brief. Chase seeks to change that by bringing this motion, but without the substance required of a brief. Not only will SFR will have to respond to the motion but, unlike through the normal briefing

process, Chase will have an opportunity to respond to SFR's opposition, and rob SFR of its ability to fully utilize its rights as an appellant.

If this Court does not deny the motion out of hand, and require full briefing, SFR will be filing an opposition to the motion, currently due on January 12, 2022. But SFR opposes the stay and asks this Court to require Chase to put its arguments in the form a brief, fully addressing SFR's opening arguments and case law, allowing SFR to reply. Had Chase simply done this in the first place it would not be taxing more of the Court's resources and would have limited its own resources to a single brief rather than two motions and replies.

The issues before the Court in this case remain pending and without a published case on all fours. SFR is prejudiced by a stay and should be allowed to file the final briefing on the issues. Thus, this Court should deny the motion to stay and decide the case on its merits following full briefing, in the proper order.

DATED this 28th day of December, 2021.

KIM GILBERT EBRON

/s/ Jacqueline A. Gilbert
JACQUELINE A. GILBERT, ESQ.
Nevada Bar No. 10593
7625 Dean Martin Drive, Suite 110
Las Vegas, NV 89139
*Attorneys for Appellant SFR
Investments Pool 1, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of December, 2021, I filed the foregoing **OPPOSITION TO MOTION TO STAY BRIEFING** which shall be served via electronic service from the Court's eFlex system to:

Master Service List

Docket Number and Case Title:	83214 - SFR INVS. POOL 1, LLC VS. JPMORGAN CHASE BANK, NAT'L ASS'N
Case Category	Civil Appeal
Information current as of:	Dec 28 2021 04:32 p.m.

Electronic notification will be sent to the following:

Jacqueline Gilbert
Matthew Lamb
Joel Tasca
Chantel Schimming
Diana Ebron

Notification by traditional means must be sent to the following:

/s/ Jacqueline A. Gilbert
an employee of Kim Gilbert Ebron