

IN THE SUPREME COURT OF THE STATE OF NEVADA

Margaret Reddy, Mohan Thalamarla,  
Max Global, Inc.

Appellants,

vs.

MEDAPPEAL, LLC, an Illinois  
Limited Liability Company,

Respondent.

Supreme Court No. 83253

Electronically Filed  
Jan 19 2022 05:01 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

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**RESPONDENT'S LIMITED OPPOSITION TO APPELLANTS' MOTION TO EXTEND  
TIME TO FILE OPENING BRIEF-SECOND REQUEST**

The Ball Law Group  
Zachary T. Ball, Esq.  
Nevada Bar No. 8364  
1935 Village Center Circle, Suite 120  
Las Vegas, NV 89134  
702-303-8600  
zball@balllawgroup.com

Attorney for Respondent:

Medappeal, LLC

Respondent Medappeal, LLC, by and through its attorney of record, Zachary T. Ball of The Ball Law Group, submits its Limited Opposition to Appellants' Motion to Extend Time to File Opening Brief-Second Request.

While Respondent sympathizes with Appellants' counsel and the situation he finds himself in, Appellants have not justified their request for an additional sixty-day extension to file their opening brief and have not explained why they have done almost nothing to prosecute an appeal that they filed almost six months ago. Notwithstanding the issues raised by Appellants, they should have been able to prepare their opening brief since they filed their Notice of Appeal last July and their counsel being out-of-state for any length of time does not mean that he was not able to work on this matter.

Appellants also fail to explain why they have not yet consolidated their two appeals, despite having filed their second appeal two months ago, and why they waited until after 11:00 p.m. the night their brief was due to seek an extension. Appellants have known of their circumstances over the past several months and they should have made their request sooner. Appellants have received two Notices of Potential Dismissal due to their failure to pay filing fees and two Notices to File Docketing Statements and it is apparent that their goal is to delay the appeal for as long as possible. Appellants caused similar delays in the District Court post appeal filing, including failure to timely provide a bond to prevent collection efforts (which initiated collection efforts then had to be unwound by Respondent.) It is fundamentally unfair to allow Appellants to continue delaying their appeal while also preventing Respondent from executing on its judgment.

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Were this Court to grant Petitioners' request, this would in essence be the third extension (given the ninety days previously provided followed by the automatic fourteen-day extension). Respondent suggests that any extension granted to Appellants be limited to at most another fourteen (14) days, so that their opening brief is due on January 26, 2022.

Dated this 19<sup>th</sup> day of January, 2022.

THE BALL LAW GROUP

/s/ Zachary T. Ball, Esq.  
Zachary T. Ball, Esq.  
Nevada Bar No. 8364  
1935 Village Center Circle, Suite 120  
Las Vegas, Nevada 89134  
Attorney for Respondent

## CERTIFICATE OF SERVICE

I certify that on the 19<sup>th</sup> day of January, 2022, I served a copy of this Limited Opposition to Motion to Extend Time to File Opening Brief Second Request upon all counsel of record to this Appeal by electronically serving the document utilizing the e-service provisions of the Nevada Supreme Court E-Flex System to the following address:

Andrew Wasielewski  
andrew@wazlaw.com

Dated this 19<sup>th</sup> day of January, 2021.

/s/ Zachary T. Ball, Esq.  
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Zachary T. Ball, Esq.