1 2	Robert Kern, Esq. Nevada Bar Number 10104 KERN LAW, Ltd.	
3	601 S. 6 <sup>th</sup> Street	
4	Las Vegas, NV 89101 (702) 518-4529 phone	Electronically Filed
5	(702) 825-5872 fax	Feb 22 2022 08:41 p.m. Elizabeth A. Brown
6	Admin@KernLawOffices.com Attorney for Appellants	Clerk of Supreme Court
7	IN THE SUPREME COURT OF THE STATE OF NEVADA	
8		
9	CLEMENT MUNEY; CHEF EXEC SUPPLIERS, LLC,	) Case Numbers: 83641, 83869 )
10	Appellants,	) )
11	VS.	) APPELLANTS' MOTION TO
12	DOMINIQUE ARNOULD,	CONSOLIDATE APPEALS
13	Respondent.	) )
14		)
15	Appellants Clement Muney and Chef Exec Suppliers, LLC (hereinafter collectively,	
16	"Muney"), appellants in Supreme Court numbers 83641 and 83869, hereby move this court	
17	for consolidation of those appeals on the grounds that the issues they present are interrelated	
18	and, to a large extent, identical and that the appeals can be decided most efficiently if	
19	consolidated. Appellant respectfully suggests that the briefing schedule set for the earlier of	
20	the appeals be replaced by the schedule for the latter, that a single set of briefs and a single	
21	appendix be presented to this Court, and that argument and all further aspects of the appeals	
22	be consolidated. In support of this motion, Appellant respectfully states:	
23	1. The appeals in question have been assigned Supreme Court numbers 83641	
24	and 83869.	
25	2. Both appeals arise from a single judgment and a post-judgment order in a	
26	single matter before the District Court, case number A-19-803488-B, <i>Dominique Arnould</i>	
27	v. Clement Muney, in the District Court of Clark County, Nevada, the honorable Judge	
-,	Nancy Allf presiding.	

The first appeal (#83641) challenges Judge Allf's Findings of Fact

and Conclusions of Law, entered September 13, 2021 and Judgment, entered September 21, 2021.

- 4. The second appeal (#83869) challenges Judge Allf's Order Re: Attorney's Fees, entered November 16, 2021. This Order was predicated on the Judgment and Findings which are the subject of the first appeal.
- 5. The facts and issues presented by the second appeal are identical to, or interrelated with, the issues presented by the first appeal. If Judge Allf's Judgment falls on appeal, her award of attorney's fees will also fall. If the Judgment is sustained, however, Judge Allf's award of fees would still require review.
- 6. The documents filed in the District Court in connection with the subject of the second appeal (#83869) are not voluminous and will not overburden the record in the first appeal.

WHEREFORE, given all of the foregoing, it is in the interests of justice and judicial economy that the two appeals be consolidated, that the briefing schedule set for the earlier of the appeals be replaced by the schedule for the latter, that a single set of briefs and a single appendix be filed covering both appeals, and that argument and all future aspects of both appeals be hereafter consolidated.

DATED this 22<sup>nd</sup> day of February, 2022.

## KERN LAW

/S/ Robert Kern
Robert Kern, Esq. NV Bar # 10104
601 S. 6<sup>th</sup> Street
Las Vegas, NV 89101
(702) 518-4529
Attorney for Appellants