

IN THE SUPREME COURT OF THE STATE OF NEVADA

CLA PROPERTIES LLC, A
CALIFORNIA LIMITED LIABILITY
COMPANY,

Appellant,

vs.

SHAWN BIDSAL, AN INDIVIDUAL,

Respondent.

Case No. 86438

Electronically Filed
Jan 23 2024 11:17 AM
Elizabeth A. Brown
Clerk of Supreme Court

CLA PROPERTIES LLC, A
CALIFORNIA LIMITED LIABILITY
COMPANY,

Appellant,

vs.

SHAWN BIDSAL, AN INDIVIDUAL,

Respondent.

Case No. 86817

MOTION FOR EXTENSION OF TIME FOR
REPLY BRIEF (FIRST REQUEST)

Appellant CLA hereby moves for a 30-day extension of time for Appellant's reply brief, which is presently due on February 5, 2024. If this motion is granted, the brief will be due on March 6, 2024. This is the first extension requested for the reply brief.

This is a very unusual and complex case arising out of a commercial business dispute. There was a lengthy multi-day arbitration, followed by district court proceedings to confirm the award. The district court record at that time contained approximately 3,000 pages of documents. The district court entered orders on these matters, and both sides appealed. On March 17, 2022, this court issued an Order of Affirmance, and the remittitur was issued on June 1, 2022.

In the meantime, there were remaining disputes that arose out of the first arbitration, including disputes regarding valuation of a business entity. The parties held a second multi-day arbitration in March and April 2021, with a second arbitrator, to resolve these disputes. The arbitrator issued an award, and both sides filed motions in the district court to confirm and/or vacate the second award. The motions were accompanied by an appendix that contained the complete records of the first and second arbitrations—consisting of more than 8,000 pages. The district court entered separate orders that were appealed separately and docketed in this court as pending Dockets 86438 and 86817. This court consolidated the dockets.

Respondent's answering brief consists of 53 pages (nearly 13,000 words), with dozens of citations to the appendix and to legal authorities. The brief was filed on January 4, 2024, which was the day on which the undersigned counsel's closest friend for 50 years passed away. Counsel Eisenberg has been dealing with this personal tragedy, and he has spent a significant amount of time helping his

friend's family. He is also spending time with medical appointments for himself and other family members. Additionally, Eisenberg has a relatively small firm, and he reached out for help from a lawyer outside the firm; but even that lawyer has also recently been battling an unexpected illness.

Even with all these interruptions, CLA's attorneys have been trying to work diligently, to the extent possible, to prepare the reply brief, which will reply to the myriad factual and legal arguments in the answering brief. Despite this diligent work, CLA needs more time to complete the reply brief.

Accordingly, CLA requests an extension until March 6, 2024, for the reply brief. This motion is being made in good faith and without an intent to delay the appeal unnecessarily.

Dated: January 23, 2024

LEMONS, GRUNDY & EISENBERG

/s/ Robert L. Eisenberg

Robert L. Eisenberg, Esq.

Nevada Bar No. 950

6005 Plumas St., Third Floor

Reno, Nevada 89519

(775) 786-6868

Attorneys for Appellant

CLA PROPERTIES LLC

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of LEMONS, GRUNDY & EISENBERG, and on this date the foregoing document was electronically filed with the Clerk of the Nevada Supreme Court, and therefore electronic service was made in accordance with the court's Master Service List.

Dated: January 23, 2024

/s/ Margie Nevin
Margie Nevin
Employee of Lemons, Grundy & Eisenberg