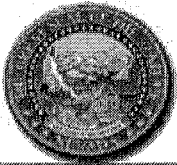


Exhibit “2”

Exhibit “2”



SUPREME COURT NEVADA

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user: H. Stan Johnson

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Filing Status

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Submitted By: Johnson, H. Stan
To: Supreme Court of Nevada
Filing Status: Filed Subject To Acceptance
Date Submitted: May 07 2015 09:10 a.m.
Date Received: May 07 2015 09:10 a.m.
Official File Stamp:

Case Title:

Case Category: Other

Document Category: Brief

Docket Number: 64349

Filing ID: 342900

Filing Status to be deleted on: 08-05-2015

Document Name**View Document**

Brief GSR's Reply Brief on Cross-Appeal Reply Brief.pdf

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Exhibit “1”

Exhibit “1”

1
2
3 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

Electronically Filed
Jan 28 2015 03:16 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

4 GOLDEN ROAD MOTOR INN, INC., a
5 Nevada Corporation d/b/a ATLANTIS
6 CASINO RESORT SPA,

7 Appellant/Cross-Respondent,
8 vs.

9 SUMONA ISLAM, an individual,
10 Respondent/Cross-Appellant
11 and

12 MEI-GSR HOLDINGS LLC, a Nevada
13 limited liability company d/b/a GRAND
14 SIERRA RESORT which claims to be
15 the successor in interest to NAV-RENO-
16 GS, LLC,

17 Respondent.

18 SUMONA ISLAM, an individual,
19 Appellant

20 vs.

21 GOLDEN ROAD MOTOR INN, INC., a
22 Nevada Corporation d/b/a ATLANTIS
23 CASINO RESORT SPA,

24 Respondent.

25 MEI-GSR HOLDINGS LLC d/b/a
26 GRAND SIERRA RESORT,

27 Appellant/Cross-Respondent,
28 vs.

29 GOLDEN ROAD MOTOR INN, INC., a
30 Nevada Corporation d/b/a ATLANTIS
31 CASINO RESORT SPA,

32 Respondent/Cross-Appellant.

Case No.: 64349

Case No.: 64452

Case No.: 65497

33 **STIPULATION FOR EXTENSION OF**
34 **TIME TO FILE ANSWERING AND REPLY BRIEFS**

35 IT IS HEREBY STIPULATED AND AGREED, by and between the parties
36 to these appeals, through their undersigned counsel, pursuant to NRAP 31(b)(2),
37 that Golden Road Motor Inn, Inc. d/b/a Atlantis Casino Resort Spa ("Atlantis")
38

1 shall have an extension of thirty days, or until March 2, 2015 to file its briefs
2 Replying to the Answering briefs filed MEI-GSR Holdings LLC d/b/a Grand
3 Sierra Resort and Sumona Islam, as well as its Answering brief to the cross-appeal
4 of MEI-GSR Holdings LLC d/b/a Grand Sierra Resort ("GSR"). Those briefs are
5 currently due on January 31, 2015.

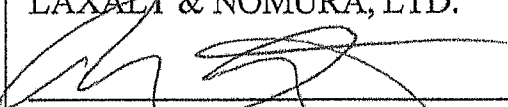
6 It is further stipulated and agreed that GSR shall file any Reply brief within
7 60 days after service of Atlantis' Answering brief on GSR's cross-appeal.

8 DATED: 1/28/15

DATED: _____

9
10 LAXALT & NOMURA, LTD.

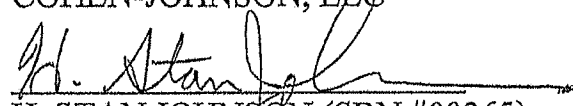
LAW OFFICES OF MARK WRAY

11 
12 ROBERT A. DOTSON (SBN #5285)
13 ANGELA M. BADER (SBN #5574)
14 9600 Gateway Drive
15 Reno, Nevada 89520
16 Attorneys for Appellant/Respondent
Golden Road Motor Inn, Inc. dba
Atlantis Casino Resort Spa

MARK WRAY (SBN #4425)
608 Lander Street
Reno, Nevada 89509
Attorney for Appellant/Respondent
Sumona Islam

17 DATED: 1-28-15

18 COHEN-JOHNSON, LLC

19 
20 H. STAN JOHNSON (SBN #00265)
21 255 E. Warm Springs Road, Suite 11
22 Las Vegas, Nevada 89119
23 Attorneys for Appellant/Respondent
24 MEI-GSR Holdings, LLC dba
Grand Sierra Resort

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16 Attorneys for Appellant/Respondent
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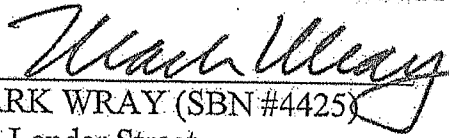
17 DATED: _____

18 COHEN-JOHNSON, LLC

19
20
21 H. STAN JOHNSON (SBN #00265)
22 255 E. Warm Springs Road, Suite 11
23 Las Vegas, Nevada 89119
24 Attorneys for Appellant/Respondent
MEI-GSR Holdings, LLC dba
Grand Sierra Resort

DATED: Jan 28, 2015

LAW OFFICES OF MARK WRAY


MARK WRAY (SBN #4425)
608 Lander Street
Reno, Nevada 89509
Attorney for Appellant/Respondent
Sumona Islam

COHEN-JOHNSON, LLC
H. STAN JOHNSON, ESQ.
Nevada Bar No. 00265
sjohnson@cohenjohnson.com
STEVEN B. COHEN, ESQ.
Nevada Bar No. 2327
scohen@cohenjohnson.com
255 E. Warm Springs Road, Suite 100
Las Vegas, Nevada 89119
Telephone: (702) 823-3500
Facsimile: (702) 823-3400
*Attorneys for Respondent/Cross-Appellant,
Grand Sierra Resort*

Electronically Filed
Jun 03 2015 11:40 a.m.
Tracie K. Lindeman
Clerk of Supreme Court

IN THE SUPREME COURT OF THE STATE OF NEVADA

GOLDEN ROAD MOTOR INN, INC., a
Nevada Corporation d/b/a ATLANTIS CASINO
RESORT SPA,

Appellant/Cross Respondent,
vs.

SUMONA ISLAM, an individual,

Respondent/Cross-Appellant

and

MEI-GSR HOLDINGS, LLC, a Nevada limited
liability company d/b/a/ GRAND SIERRA
RESORT which claims to be the successor in
interest to NAV_RENO- GS, LLC.

Respondent.

Case No.: 64349

SUMONA ISLAM, an individual,

Appellant,

vs.

GOLDEN ROAD MOTOR INN, INC., a Nevada
Corporation d/b/a ATLANTIS CASINO RESORT
SPA,

Respondent.

Case No.: 64452

MEI-GSR HOLDINGS LLC d/b/a GRAND
SIERRA RESORT,

Appellant,

vs.

GOLDEN ROAD MOTOR INN, INC., a Nevada
Corporation d/b/a ATLANTIS CASINO RESORT
SPA,

Respondent

Case No.: 65497

**RESPONDENT/CROSS APPELLANT'S MOTION FOR LEAVE TO FILE AN
UNTIMELY REPLY**

Respondent/Cross Appellant, MEI-GSR Holdings, LLC. d/b/a Grand Sierra Resort, by and
though its counsel of record, H. Stan Johnson, Esq. of Cohen|Johnson, LLC, respectfully
requests that it be granted an Leave to File an Untimely Reply Brief. Appellant sets forth the
following in support of this motion.

This Motion is based on the pleadings and papers on file herein, the exhibits attached hereto,
the Affidavits submitted herewith, and any argument this court may entertain.

Dated this 3rd day of June, 2015

COHEN|JOHNSON, LLC.

By: /s/ H. Stan Johnson

H. Stan Johnson, Esq.

Nevada Bar No. 00265

Steven B. Cohen, Esq.

Nevada Bar No. 2327

255 E. Warm Springs Road, Ste. 100

Las Vegas, NV 89119

Attorneys for Respondent/Cross

Appellant MEI-GSR Holdings, LLC.

d/b/a Grand Sierra Resort and Casino

POINTS AND AUTHORITIES

I.

BACKGROUND

The parties agreed to allow Golden Road Motor Inn., Inc. d/b/a Atlantis Casino Report Spa (“Atlantis”) to have a thirty (30) day extension, or until March 2, 2015 to file its’ briefs Replying to the Answering briefs filed MEI-GSR Holdings, LLC d/b/a Grand Sierra Resort and Sumona Islam. (*See Copy of Stipulation for Extension of Time attached as Exhibit “1”*) The brief was currently due on January 31, 2015. The parties further agreed that MEI-GSR Holdings, LLC d/b/a Grand Sierra Report (“GSR”) would have 60 days after service of Atlantis’s Answering brief on GSR’s cross-appeal. Based on the extension, GSR would have until May 2, 2015 to file its Reply. In fact, there was oversight on the calendar and the Reply was filed May 7, 2015. (*See copy of receipt attached as Exhibit “2”*)

Based on the foregoing, the Appellant requests that the Court allow the filing of the GSR’s Reply Brief on Cross-Appeal that was filed on the 7th of May, 2015. This will not delay or unduly prejudice the parties. No other deadlines need to be amended as a result of this request.

II.

STATEMENT OF THE LAW

NRAP 31(b)(3)

Motions for Extensions of Time. A motion for extension of time for filing a brief may be made no later than the due date for the brief and must comply with the provisions of this Rule and Rule 27.

Contents of Motion.

A motion for extension of time for filing a brief shall include the following:

- (i) The date when the brief is due;
- (ii) The number of extensions of time previously granted (including a 5-day telephonic extension), and if extensions were granted, the original date when the brief was due;

- 1 (iii) Whether any previous requests for extensions of time have been denied or denied
2 in part;
3 (iv) The reasons or grounds why an extension is necessary; and
4 (v) The length of the extension requested and the date on which the brief would
5 become due.

6 In this present matter, the Reply Brief was due May 2, 2015. The parties had already
7 agreed by stipulation to allow Atlantis additional time to file its respective brief. GSR has made
8 no requests by motion for any extensions of time to file any documents in this case. This was an
9 inadvertent error and the matter was not filed on the correct day. GSR's Reply is already filed
10 pending approval from this Court to allow the late filing and as such there is no additional time
11 needed to complete the Reply. This delay will not adversely affect any court ordered dates and
12 the Respondent will not be unduly prejudiced by the delay.

13 **III.**

14 **Conclusion**

15 Based on the above the Respondent/Cross Appellant respectfully requests that the Court
16 allow the late filing and accept the late filed reply brief.

17 Dated this 3rd day of June, 2015
18

19 **COHEN|JOHNSON, LLC.**
20

21 By: /s/ H. Stan Johnson
22 H. Stan Johnson, Esq.
23 Nevada Bar No. 00265
24 Steven B. Cohen, Esq.
25 Nevada Bar No. 2327
26 255 E. Warm Springs Road, Ste. 100
27 Las Vegas, NV 89119
28 *Attorneys for Respondent/Cross
Appellant MEI-GSR Holdings, LLC.
d/b/a Grand Sierra Resort and Casino*

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INDEX OF EXHIBITS

<u>Exhibits</u>	<u>Description</u>	<u>Pages</u>
1.	Stipulation for Extension of Time	3
2	Receipt of Filing from May 7, 2015	2

CERTIFICATE OF SERVICE

The hereby certify that I am an employee of Cohen-Johnson, LLC, and that on the 3rd day of June, 2015, I caused to be served a true and correct copy of the foregoing **RESPONDENT/CROSS APPELLANT'S MOTION FOR LEAVE TO FILE AN UNTIMELY REPLY** in the following manner: Via U.S. Regular Mail and (Electronic Service) Pursuant to Rule 5(d) of the Nevada Rules of Civil Procedure, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by the Court's facilities to the parties listed below at their last-known mailing addresses, on the date above written:

LAXALT & NOMURA, LTD.

Robert A. Dotson, Esq.
9600 Gateway Drive
Reno, Nevada 89520
*Attorneys for Appellant/Respondent
Golden Road Motor Inn, Inc. d/b/a
Atlantis Casino Resort and Spa*

LAW OFFICES OF MARK WRAY

Mark Wray, Esq.
608 Lander Street
Reno, Nevada 89059
*Attorney for Appellant/Respondent Summona
Islam*

/S/ Kelly J. Montgomery
An employee of Cohen-Johnson, LLC