

IN THE SUPREME COURT OF THE STATE OF NEVADA

HARVEST MANAGEMENT SUB
LLC,

Petitioner,

v.

THE EIGHTH JUDICIAL DISTRICT
COURT OF THE STATE OF
NEVADA, IN AND FOR THE
COUNTY OF CLARK; and THE
HONORABLE LINDA MARIE BELL,

Respondents,

and

AARON M. MORGAN; AND DAVID
E. LUJAN,

Real Parties in Interest.

AARON M. MORGAN,

Petitioner,

v.

THE EIGHTH JUDICIAL DISTRICT
COURT OF THE STATE OF
NEVADA, IN AND FOR THE
COUNTY OF CLARK; and THE
HONORABLE LINDA MARIE BELL,

Respondents,

and

HARVEST MANAGEMENT SUB
LLC; AND DAVID E. LUJAN,

Real Parties in Interest.

Case No. 80837

Electronically Filed
Apr 16 2021 05:03 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Case No. 81975

MOTION TO CONSOLIDATE
CASES

MOTION TO CONSOLIDATE CASES

Real Party in Interest in Case No. 80837/Petitioner in Case No. 81975, Aaron M. Morgan (“Morgan”), by and through his counsel of record, Richard Harris Law Firm and Claggett & Sykes Law Firm, hereby moves this Court to consolidate the two original proceedings docketed as Supreme Court Case Nos. 80837 and 81975.

According to NRAP 3(b)(2), this Court should consolidate these two original proceedings for purposes of judicial economy. This rule provides, “When the parties have filed separate timely notices of appeal, the appeals may be joined or consolidated by the court upon its own motion or upon motion of a party.” Both petitions for extraordinary writ relief arise from the same District Court case, involves the same parties, and similar issues. Essentially, both cases ask for a different remedy from the District Court’s rulings arising out of the verdict form. As such, the issues of both petitions for extraordinary writ relief are interrelated.

In Case No. 80837, the Court already heard oral argument earlier this week, and the case will now proceed to a disposition. Similarly, Case No. 81975 has been fully briefed and can also proceed to a disposition (unless the Court sets an oral argument hearing) together with the Court’s decision in Case No. 80837.

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Therefore, Morgan respectfully requests that the Court consolidate both original proceedings for the purpose of reaching a uniform disposition in both cases.

Dated this 16th day of April 2021.

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing **MOTION TO CONSOLIDATE CASES** with the Nevada Supreme Court on the 16th day of April 2021. Electronic service of the foregoing document shall be made in accordance with the Master Service List as follows:

Bryan A. Boyack (Richard Harris Law Firm)
Benjamin P. Cloward (Richard Harris Law Firm)
Andrea M. Champion (Bailey Kennedy)
Sarah E. Harmon (Bailey Kennedy)
Dennis L. Kennedy (Bailey Kennedy)

I further certify that the foregoing document was emailed to the following:

Honorable Linda Marie Bell, District Court Judge
Eighth Judicial District Court, Department 7
dept07lc@clarkcountycourts.us

I further certify that the foregoing document was mailed via U.S. Mail to the following:

David E. Lujan
651 McKnight Street, Apt. 16
Las Vegas, Nevada 89501

/s/ Anna Gresl

Anna Gresl, an employee of
Claggett & Sykes Law Firm