

IN THE SUPREME COURT OF THE STATE OF NEVADA

CLUB VISTA FINANCIAL SERVICES,  
L.L.C., a Nevada Limited Liability  
Company; THARALDON MOTELS II,  
INC., a North Dakota corporation; and  
GARY D. THARALDSON,

Petitioners,

v.

THE EIGHTH JUDICIAL DISTRICT  
COURT, COUNTY OF CLARK, STATE OF  
NEVADA, AND THE HONORABLE  
MARK R. DENTON, DISTRICT JUDGE,

Respondents

and

SCOTT FINANCIAL CORPORATION, a  
North Dakota corporation; BRADLEY J.  
SCOTT; BANK OF OKLAHOMA, N.A., a  
national bank; GEMSTONE  
DEVELOPMENT WEST, INC., a Nevada  
corporation; ASPHALT PRODUCTS  
CORPORATION D/B/A APCO  
CONSTRUCTION, a Nevada corporation,

Real Parties in Interest.

Electronically Filed  
Jun 21 2011 04:27 p.m.  
Tracie K. Lindeman  
Clerk of Supreme Court

Case No.: 57641

District Court Case: A579963

**MOTION FOR LEAVE TO FILE SUPPLEMENT TO ANSWER TO  
PETITION FOR WRIT OF MANDAMUS OR PROHIBITION IN LIGHT  
OF SUBSTITUTION OF PETITIONERS' TRIAL COUNSEL**

J. Randall Jones  
Nevada Bar No. 1927  
Jennifer C. Dorsey  
Nevada Bar No. 6456  
KEMP, JONES & COULTHARD, LLP  
3800 Howard Hughes Pkwy. 17<sup>th</sup> Floor  
Las Vegas, Nevada 89169

*Attorneys for Real Parties in Interest SCOTT  
FINANCIAL CORPORATION and  
BRADLEY J. SCOTT*

Real Parties in Interest SCOTT FINANCIAL CORPORATION and  
BRADLEY J. SCOTT by and through their counsel of record, KEMP, JONES &  
COULTHARD, hereby move this Court for leave to file a Supplement to their  
Answer to Petition for Writ of Mandamus of Prohibition in light of the substitution of  
Petitioners' trial counsel. The substitution is a development in this case that directly  
impacts the issues presented by this writ and the answer (filed on February 8, 2011),  
and this Court should have the benefit of this new information to fully evaluate those  
issues. Accordingly, the Scott Real Parties in Interest ask this Court to grant them  
leave to file their very brief supplement, which was submitted to this Court on June  
20, 2011.

DATED this 21<sup>st</sup> day of June, 2011.

Respectfully submitted by:

KEMP, JONES & COULTHARD, LLP

/s/ J. Randall Jones  
J. RANDALL JONES, ESQ. (1927)  
JENNIFER C. DORSEY, ESQ. (6456)  
3800 Howard Hughes Parkway  
Seventeenth Floor  
Las Vegas, Nevada 89169  
*Attorneys for Scott Financial Corporation  
and Bradley J. Scott*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 21<sup>ST</sup> day of June, 2011, the foregoing **MOTION FOR  
LEAVE TO FILE SUPPLEMENT TO ANSWER TO PETITION FOR WRIT OF  
MANDAMUS OR PROHIBITION IN LIGHT OF SUBSTITUTION OF**

**PETITIONERS' TRIAL COUNSEL** was served on the following person(s) by U.S.

Mail or through this Court's electronic service system:

Honorable Mark R. Denton  
Department 13  
Eighth Judicial District Court  
200 Lewis Avenue  
Las Vegas, Nevada 89155

Von Heinz, Esq.  
LEWIS & ROCA, LLP  
3993 Howard Hughes Parkway #600  
Las Vegas, Nevada 89169

1 John D. Clayman, Esq.  
2 Piper Turner, Esq.  
3 FREDERIC DORWART LAWYERS  
4 Old City Hall  
5 124 East Fourth Street  
6 Tulsa, Oklahoma 74103-5010

7 P. Kyle Smith, Esq.  
8 SMITH LAW OFFICE  
9 10161 Park Run Drive  
10 Las Vegas, Nevada 89145

11 Terry A. Coffing, Esq.  
12 MARQUIS AURBACH COFFING  
13 10001 Park Run Drive  
14 Las Vegas, Nevada 89145

15 Mark E. Ferrario, Esq.  
16 Tami D. Cowden, Esq.  
17 GREENBERG TRAURIG, LLP  
18 3773 Howard Hughes Parkway  
19 Suite 400 North  
20 Las Vegas, Nevada 89109

K. Layne Morrill, Esq.  
Martin A. Aronson, Esq.  
John T. Mossier, Esq.  
MORRILL & ARONSON, P.L.C.  
One East Camelback Road #340  
Phoenix, Arizona 85012

Martin Muckelroy, Esq.  
COOKSEY, TOOLEN, GAGE, DUFFY & WOOG  
3930 Howard Hughes Parkway #200  
Las Vegas, Nevada 89169

Gwen Rutar Mullins, Esq.  
Wade Gouchnour, Esq.  
HOWARD & HOWARD  
3800 Howard Hughes Parkway #1400  
Las Vegas, Nevada 89169

Robert L. Eisenberg, Esq.  
LEMONS, GRUNDY & EISENBERG  
6005 Plumas Street #300  
Reno, Nevada 89519

/s/ Angela Embrey  
An employee of Kemp, Jones & Coulthard, LLP