IN THE SUPREME COURT OF THE STATE OF NEVADA

INDICATE FULL CAPTION:

Dr. Joel Slade,

vs.

Caesars Entertainment Operating Company, Caesars Entertainment Corporation, and Paris Las Vegas Operating Company, LLC

No. 62720

DOCKETING STATEMENT
CIVIL APPEALS

GENERAL INFORMATION

All appellants not in proper person must complete this docketing statement. NRAP 14(a). The purpose of the docketing statement is to assist the Supreme Court in screening jurisdiction, classifying cases for en banc, panel, or expedited treatment, compiling statistical information and identifying parties and their counsel.

WARNING

This statement must be completed fully, accurately and on time. NRAP 14(c). The Supreme Court may impose sanctions on counsel or appellant if it appears that the information provided is incomplete or inaccurate. *Id.* Failure to fill out the statement completely or to file it in a timely manner constitutes grounds for the imposition of sanctions, including a fine and/or dismissal of the appeal.

A complete list of the documents that must be attached appears as Question 26 on this docketing statement. Failure to attach all required documents will result in the delay of your appeal and may result in the imposition of sanctions.

This court has noted that when attorneys do not take seriously their obligations under NRAP 14 to complete the docketing statement properly and conscientiously, they waste the valuable judicial resources of this court, making the imposition of sanctions appropriate. *See* KDI Sylvan Pools v. Workman, 107 Nev. 340, 344, 810 P.2d 1217, 1220 (1991). Please use tab dividers to separate any attached documents.

1. Judicial District EIGHT Department XIX

County CLARK Judge ALLAN R. EARL (See attach. 1)

District Ct. Case No. A-12-665676

2. Attorney filing this docketing statement:

Attorney ROBERT A. NERSESIAN Telephone (702) 385-5454

Firm NERSESIAN & SANKIEWICZ

Address 528 S. 8TH ST., LAS VEGAS, NV 89101

Client(s) DR. JOEL SLADE

If this is a joint statement by multiple appellants, add the names and addresses of other counsel and the names of their clients on an additional sheet accompanied by a certification that they concur in the filing of this statement.

3. Attorney(s) representing respondents(s):

Attorney JAMES E. WHITMIRE III Telephone (702) 948-8771

Firm SANTORO WHITMIRE, LTD.

Address 10100 W. Charleston Blvd. Ste. 250
Las Vegas, Nevada 89135

Client(s) ALL DEFENDANTS/RESPONDENTS

Attorney _____ Telephone _____

Firm _____

Address

Client(s) _____

(List additional counsel on separate sheet if necessary)

4. Nature of disposition below (check all that apply):

- ☐ Judgment after bench trial
- ☐ Judgment after jury verdict
- ☐ Summary judgment
- ☐ Default judgment
- ☐ Grant/Denial of NRCP 60(b) relief
- ☐ Grant/Denial of injunction
- ☐ Grant/Denial of declaratory relief
- ☐ Review of agency determination
- ☒ Dismissal:
  - ☐ Lack of jurisdiction
  - ☒ Failure to state a claim
  - ☐ Failure to prosecute
  - ☐ Other (specify): _____
- ☐ Divorce Decree:
  - ☐ Original ☐ Modification
- ☐ Other disposition (specify): _____

5. Does this appeal raise issues concerning any of the following?

- ☐ Child Custody
- ☐ Venue
- ☐ Termination of parental rights

6. Pending and prior proceedings in this court. List the case name and docket number of all appeals or original proceedings presently or previously pending before this court which are related to this appeal:

7. Pending and prior proceedings in other courts. List the case name, number and court of all pending and prior proceedings in other courts which are related to this appeal (*e.g.*, bankruptcy, consolidated or bifurcated proceedings) and their dates of disposition:

8. Nature of the action. Briefly describe the nature of the action and the result below:

PLAINTIFF IS A PHYSICIAN/SPECIALIST OF GOOD STANDING AND REPUTE. BY WRITTEN CORRESPONDENCE, DEFENDANTS HAVE DENIED PLAINTIFF ACCESS TO ALL CASINOS AFFILLIATED WITH CAESARS ENTERTAINMENT. THERE WAS NO REASON TO DENY ACCESS. DEFENDANT DESIRES, AT A MINIMUM, TO ATTEND CONFERENCES OF NATIONAL CONCERN TO PHYSICIANS HELD AT THE CASINOS IN GENERAL, AND AT PARIS CASINO, IN PARTICULAR. PLAINTIFF ASSERTS THAT THE DEFENDANTS HAVE BREACHED THEIR OBLIGATION TO ALLOW PUBLIC ACCESS TO PLACES OF PUBLIC AMUSEMENT OR PLACES VESTED WITH A PUBLIC INTEREST AND FUNCTION.

9. Issues on appeal. State concisely the principal issue(s) in this appeal (attach separate sheets as necessary):

DOES NEVADA COMMON LAW PROVIDE THAT PERSONS HAVE A RIGHT TO ENTER THE PREMISES OF GAMING LICENSEES FOR PROPER AND NON-DISRUPTIVE PURPOSES IN ORDINARY CIRCUMSTANCES AND ABSENT A GOOD REASON TO EXCLUDE SUCH PERSONS?

DOES NEVADA STATUTORY LAW, NRS 463.0129, PROVIDE THAT PERSONS HAVE A RIGHT TO ENTER THE PREMISED OF GAMING LICENSEES FOR PROPER AND NON-DISRUPTIVE PURPOSES IN ORDINARY CIRCUMSTANCES AND ABSENT A GOOD REASON TO EXCLUDE SUCH PERSONS?

10. Pending proceedings in this court raising the same or similar issues. If you are aware of any proceedings presently pending before this court which raises the same or similar issues raised in this appeal, list the case name and docket numbers and identify the same or similar issue raised:

11. Constitutional issues. If this appeal challenges the constitutionality of a statute, and the state, any state agency, or any officer or employee thereof is not a party to this appeal, have you notified the clerk of this court and the attorney general in accordance with NRAP 44 and NRS 30.130?

☐ N/A

☐ Yes

☐ No

If not, explain:

12. Other issues. Does this appeal involve any of the following issues?

☐ Reversal of well-settled Nevada precedent (identify the case(s))

☐ An issue arising under the United States and/or Nevada Constitutions

☒ A substantial issue of first impression

☒ An issue of public policy

☐ An issue where en banc consideration is necessary to maintain uniformity of this court's decisions

☐ A ballot question

If so, explain: There exists a split of authority on the issues presented, and Nevada courts have never addressed the issues. Further, with the statutory mandate concerning the importance of the casino industry to the State and the repute of the State, Nevada's gaming industry is suffering from a perceived application of the majority rule which is injuring the industry.

13. Trial. If this action proceeded to trial, how many days did the trial last? _____

Was it a bench or jury trial? _____

14. Judicial Disqualification. Do you intend to file a motion to disqualify or have a justice recuse him/herself from participation in this appeal? If so, which Justice?

TIMELINESS OF NOTICE OF APPEAL

15. Date of entry of written judgment or order appealed from February 5, 2013

If no written judgment or order was filed in the district court, explain the basis for seeking appellate review:

16. Date written notice of entry of judgment or order was served February 6, 2012

Was service by:

☐ Delivery

☒ Mail/electronic/fax

17. If the time for filing the notice of appeal was tolled by a post-judgment motion (NRCP 50(b), 52(b), or 59)

(a) Specify the type of motion, the date and method of service of the motion, and the date of filing.

☐ NRCP 50(b) Date of filing _____

☐ NRCP 52(b) Date of filing _____

☐ NRCP 59 Date of filing _____

NOTE: Motions made pursuant to NRCP 60 or motions for rehearing or reconsideration may toll the time for filing a notice of appeal. ***See*** **AA Primo Builders v. Washington, 126 Nev. ____, 245 P.3d 1190 (2010).**

(b) Date of entry of written order resolving tolling motion _____

(c) Date written notice of entry of order resolving tolling motion was served _____

Was service by:

☐ Delivery

☐ Mail

18. Date notice of appeal filed February 28, 2013

If more than one party has appealed from the judgment or order, list the date each notice of appeal was filed and identify by name the party filing the notice of appeal:

19. Specify statute or rule governing the time limit for filing the notice of appeal, *e.g.*, NRAP 4(a) or other

NRAP 4(a)

SUBSTANTIVE APPEALABILITY

20. Specify the statute or other authority granting this court jurisdiction to review the judgment or order appealed from:

(a)

- ☒ NRAP 3A(b)(1)
- ☐ NRAP 3A(b)(2)
- ☐ NRAP 3A(b)(3)
- ☐ Other (specify)
- ☐ NRS 38.205
- ☐ NRS 233B.150
- ☐ NRS 703.376

(b) Explain how each authority provides a basis for appeal from the judgment or order:
The order appealed from was an order dismissing Plaintiff's complaint. This is a final judgment. Pursuant to NRAP 3A(b)(1), this is an appealable order, and Plaintiff has filed a timely Notice of Appeal.

21. List all parties involved in the action or consolidated actions in the district court:

(a) Parties:

Dr. Joel Slade
Caesars Entertainment Corporation
Caesars Entertainment Operating Company
Paris Las Vegas Entertainment Operating Company, LLC., d/b/a Paris Las Vegas

(b) If all parties in the district court are not parties to this appeal, explain in detail why those parties are not involved in this appeal, *e.g.*, formally dismissed, not served, or other:

22. Give a brief description (3 to 5 words) of each party's separate claims, counterclaims, cross-claims, or third-party claims and the date of formal disposition of each claim.

Plaintiff's claim for breach of the duty of public access. February 5, 2013

23. Did the judgment or order appealed from adjudicate ALL the claims alleged below and the rights and liabilities of ALL the parties to the action or consolidated actions below?

☒ Yes

☐ No

24. If you answered "No" to question 23, complete the following:

(a) Specify the claims remaining pending below:

(b) Specify the parties remaining below:

(c) Did the district court certify the judgment or order appealed from as a final judgment pursuant to NRCP 54(b)?

☐ Yes

☐ No

(d) Did the district court make an express determination, pursuant to NRCP 54(b), that there is no just reason for delay and an express direction for the entry of judgment?

☐ Yes

☐ No

25. If you answered "No" to any part of question 24, explain the basis for seeking appellate review (*e.g.*, order is independently appealable under NRAP 3A(b)):

26. Attach file-stamped copies of the following documents:

- The latest-filed complaint, counterclaims, cross-claims, and third-party claims
- Any tolling motion(s) and order(s) resolving tolling motion(s)
- Orders of NRCP 41(a) dismissals formally resolving each claim, counterclaims, cross-claims and/or third-party claims asserted in the action or consolidated action below, even if not at issue on appeal
- Any other order challenged on appeal
- Notices of entry for each attached order

VERIFICATION

I declare under penalty of perjury that I have read this docketing statement, that the information provided in this docketing statement is true and complete to the best of my knowledge, information and belief, and that I have attached all required documents to this docketing statement.

Dr. Joel Slade
Name of appellant

Robert A. Nersesian
Name of counsel of record

March 25, 2013
Date

Signature of counsel of record

Clark County, Nevada
State and county where signed

CERTIFICATE OF SERVICE

I certify that on the 25th day of March, 2013, I served a copy of this completed docketing statement upon all counsel of record:

☐ By personally serving it upon him/her; or

☒ By mailing it by first class mail with sufficient postage prepaid to the following address(es): (NOTE: If all names and addresses cannot fit below, please list names below and attach a separate sheet with the addresses.)

James E. Whitmire
Santoro Whitmire
10100 W. Charleston Blvd. Ste. 250
Las Vegas, Nevada 89135

Dated this 25th day of March, 2013

Signature

ATTACHMENT 1

The matter was heard by the Hon. Elizabeth Gonzalez substituting for the Hon. Allen R. Earl, and the motion to dismiss was granted from the bench by the Hon. Elizabeth Gonzalez. The Hon. Allen R. Earl subsequently signed the order entered.

Electronically Filed
07/24/2012 12:14:26 PM

CLERK OF THE COURT

COMP
Robert A. Nersesian
Nevada Bar No. 2762
Thea Marie Sankiewicz
Nevada Bar No. 2788
Nersesian & Sankiewicz
528 S. Eighth Street
Las Vegas, Nevada 89101
Telephone: 702-385-5454
Facsimile: 702-385-7667
email: vegaslegal@aol.com
Attorneys for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

DR. JOEL SLADE, Plaintiff, vs. **CAESARS ENTERTAINMENT CORPORATION, PARIS LAS VEGAS OPERATING COMPANY, LLC, d/b/a PARIS LAS VEGAS, AND CAESARS ENTERTAINMENT OPERATING COMPANY, INC.,** Defendants.	A-12-665676-C Case No. Dept. No. XIX

COMPLAINT

NOW COMES plaintiff, Dr. Joel Slade ("Plaintiff"), and for his complaint against the defendants, states as follows:

1. Defendant, Caesars Entertainment Corporation, f/k/a Harrah's Entertainment Corporation, ("Caesars") has its principal place of business in Clark County, Nevada.
2. Defendant, Paris Las Vegas Operating Company, LLC ("Paris") has its principal place of business in Clark County, Nevada.

3. Defendant, Caesars Entertainment Operating Company, has its principal place of business in Clark County, Nevada.
4. Plaintiff is a resident of Tennessee and oft-times visitor to Las Vegas.
5. Plaintiff is a licensed medical doctor and specialist.
6. Plaintiff's visits to Las Vegas are often in conjunction with symposiums, conventions and/or seminars being held within his profession in Las Vegas.
7. Oftentimes these events are held at properties affiliated with the defendants, and plaintiff has attended, and expects to attend in the future, such events at Paris and other venues affiliated with Caesars and Operating. See e.g. Exhibit 1.
8. Pursuant to NRS 1.030, absent justifiable or good cause (e.g., a prior event of substantive disruptive conduct upon the premises, a known moral or criminal history which calls into question the guests ability to attend the amusement relative to the safety of other guests, an illegal or immoral purpose accompanying the entry, etc.) the common law in Nevada restricts a public amusement from excluding members of the public from partaking in the services offered by the amusement.
9. Further, considering the common law stated as above, pursuant to NRS § 463.0129, a casino must grant access to members of the public.
10. Plaintiff has frequented casinos affiliated with Caesars since, at least, 1994 when he obtained an account with its slot club operation.
11. The slot club referenced is currently operated by Operating.
12. In response to a request for information to Operating concerning historic gambling by the plaintiff, Operating or Caesars responded to plaintiff's request for gaming information relative to his gaming in 2011.

13. Per the response referenced in the preceding paragraph, various entities affiliated with Caesars earned a gross amount approaching $40,000.00 from the plaintiff in 2011.

14. Plaintiff has never been disorderly within any company affiliated with Caesars, has never undertaken anything to cause injury to any company affiliated with Caesars, and has never suffered a complaint of any nature relative to his play, his actions as a guest, or other circumstance surrounding any company affiliated with Caesars.

15. In the summer of 2011, plaintiff received a letter from a casino affiliated with Caesars written by one Greg Hinton and on the letterhead of Harrah's Casino & Hotel, Tunica, stating that plaintiff has been evicted from that casino, and further providing, "This is an eviction that will be enforced at all Caesar's Entertainment owned, operated, or managed properties throughout the entire Caesars Entertainment Company. Should you enter any part of any property, you may be subject to arrest for trespassing under that states (sic) trespassing law. Should your presence go undetected and you win in the casino; all winning (sic) will be forfeited including jackpots. **You must refrain from entering any Caesar's related property in any part of the United States."** (Emphasis in original).

16. In Nevada Caesars and Operating are affiliated with many gaming licensees to which the letter referenced in the preceding paragraph appears to be intended to apply, including casinos commonly referred to as: The Rio; Caesars Palace; Paris; Planet Hollywood; Bally's; Imperial Palace; Harrah's; Flamingo, and Harvey's.

17. Neither Greg Hinton nor Harrah's Casino & Hotel, Tunica, own or occupy any of the casinos referenced in the preceding paragraph.

18. Neither Caesars nor Operating own or occupy any of the casinos referenced in the paragraph two back.

19. The casinos affiliated with Caesars in Nevada operate as a public calling, both by common law and by statute ("The gaming industry is vitally important to the economy of the State and the general welfare of the inhabitants." Nev. Rev. Stat. Ann. § 463.0129).

20. Under the common law as applicable in Nevada through Nev. Rev. Stat. Ann. § 1.030, the casinos affiliated with Caesars in Nevada are public amusements and must allow access to members of the public absent certain circumstances inapplicable with respect to the plaintiff.

21. Under Nev. Rev. Stat. Ann. § 463.0129, the State retains extensive authority and control over gaming and its gaming licensees, and such authority includes activities related to gaming (e.g., a hotel attendant to a casino, which are commonly one and the same).

22. Under Nev. Rev. Stat. Ann. § 463.0129(1)(e), "To ensure that gaming is conducted honestly, **competitively** and free of criminal and corruptive elements, all gaming establishments in this state must remain open to the general public and **the access of the general public to gaming activities must not be restricted in any manner** except as provided by the Legislature. (Emphasis added).

23. Plaintiff, as a physician, gambler (incidentally not even an advantage gambler as that term is used in the industry), tourist, and respected member of his community is the embodiment of a member of the general public.

24. Under the common law, proprietors of public callings cannot exclude members of the general public absent certain exceptions inapplicable to the plaintiff.

25. Admittedly, Nev. Rev. Stat. Ann. § 463.0129, does also provide that, "This section does not . . . [a]brogate or abridge **any common - law right** (emphasis added) of a gaming establishment to exclude any person from gaming activities or eject any person from the

Nersesian & Sankiewicz
528 SOUTH EIGHTH STREET
LAS VEGAS NEVADA 89101

premises of the establishment for any reason." Nevertheless, this section does not license the activities referenced above in barring the plaintiff from Caesars affiliated properties because:

a. There is no "common – law right of a gaming establishment to exclude" persons such as the plaintiff, and absent such right, the term "any common - law right" is referring to common – law rights exclusive of plaintiff (e.g. common law right to eject disorderly persons; common law right to eject persons soliciting for a competitor);

b. If the provision were to apply to the plaintiff, then the entire provision would have no meaningful affect, thusly running afoul of the adage that it is to be presumed that all language in a statute has an application, and an application of the language that has some effect is always correct over an application that has no effect.

c. As an innkeeper operating an inn in conjunction with a casino, defendants are bound by the common law obligations of an innkeeper to accept all suitable travelers, and the common law actually restricts the action (rather than allows the action) taken by the defendants.

26. Nev. Rev. Stat. Ann. § 463.0129 is specific to gaming licensees, and any variance from its terms by the legislature must also be specific to gaming licensees, and statutes of general application could not vary the terms of Nev. Rev. Stat. § 463.0129, as mandated public access.

27. Plaintiff has indications that the highest levels of executives within Caesars or Operating intend to enforce the restriction imposed by Harrah's Casino & Hotel, Tunica. To wit: Following a letter to such executives, plaintiff received correspondence from Harrah's

Casino & Hotel, Tunica and Caesars Entertainment, indicating that the arrest threat continued and would not be modified.

28. Caesars and Operating exercise control over the casinos affiliated with them with respect to trespass warnings and enforcing trespass warnings.

29. On September 23, 2011, Caesars allegedly confirmed in writing that it would seek to enforce the Nevada eviction of plaintiff from Nevada casinos with respect to its affiliated properties.

30. Caesars has previously indicated that the enforcement of such an eviction falls within the purview of Operating even though undertaken under Caesars' name.

31. A current case and controversy exists between the parties.

FIRST CAUSE OF ACTION—BREACH OF THE DUTY OF PUBLIC ACCESS

32. As referenced above, through representation of Caesars, plaintiff is under threat of arrest should he attempt to enter any Caesars affiliated property in Nevada.

33. Plaintiff has current plans that require the entry into Caesars affiliated properties in Las Vegas.

34. Caesars and Operating have the ability to enlist their affiliated properties in carrying through on the threat of arrest, and the current demands on plaintiff have been conveyed to the affiliated entities, who will act thereon, by these defendants.

35. Caesars affiliated properties are required by law to grant plaintiff access to Caesars affiliated properties in Nevada.

36. The actions of the defendants are interfering with plaintiff in plaintiff's profession, and are causing, and have caused, injury to the plaintiff in plaintiff's profession (for example, but not limited to, the fact that plaintiff has been effectively prohibited in

participating in matters preliminary to conferences referenced above, inclusive of being functionally restrained from submitting papers and advancing his career).

37. Plaintiff has also suffered emotional distress and professional inconvenience as a result of the restrictions on his travel, leisure, and professional activities as a result of the eviction from Caesars affiliated properties in Nevada

38. Defendants' actions have injured plaintiff in an amount in excess of $10,000.00.

SECOND CAUSE OF ACTION—DECLARATORY JUDGMENT

39. Plaintiff incorporates ¶¶ 1-38 above as though restated word for word herein.

40. Under the foregoing facts, plaintiff's rights are substantially affected by the construction and application of Nev. Rev. Stat. Ann. § 463.0129.

41. Pursuant to Nev. Rev. Stat. Ann. § 30.040, plaintiff is entitled to "have determined any question of construction or validity arising under [a] . . . statute . . . and obtain a declaration of rights, status or other legal relations thereunder."

42. Plaintiff seeks a declaration that Nev. Rev. Stat. Ann. § 463.0129 and/or the common law mandate that absent some future disabling event, under the current circumstance the defendants' and their affiliates cannot evict from, or bar the plaintiff from access to, gaming premises affiliated with Caesars or Operating and located within the State of Nevada.

43. Plaintiff also seeks a declaration that the purported trespass warnings given to the plaintiff purporting to bar him from casinos affiliated with Caesars or Operating in Nevada were entirely ineffective.

THIRD CAUSE OF ACTION—INJUNCTIVE RELIEF

44. Plaintiff incorporates ¶¶ 1-43 above as though restated word for word herein.

45. Pursuant to Nev. Rev. Stat. Ann. § 33.010, an injunction is appropriate "When it shall appear by the complaint that the plaintiff is entitled to the relief demanded, and such relief or any part thereof consists in restraining the commission or continuance of the act complained of, either for a limited period or perpetually."

46. The act complained of is the ejection and possible arrest of the plaintiff should plaintiff seek to enter casinos affiliated with Caesars or Operating within the State of Nevada, and also the threatened attempt at prosecuting the plaintiff should he enter any casinos affiliated with Caesars or Operating within the State of Nevada.

47. As noted above, under the law of Nevada, considering plaintiff's current status and condition, neither defendants nor their affiliates have any ability or right to eject, exclude, or attempt to prosecute plaintiff for an entry or attempted entry to any of the casinos affiliated with Caesars within the State of Nevada.

48. Both Caesars and Operating have the ability to direct ejection policy and access to casinos affiliated with Caesars in the State of Nevada.

49. Defendants all have the affirmative duty of assuring access of the plaintiff to all casinos affiliated with Caesars within the State of Nevada, which duty the defendants are refusing to follow with respect to the plaintiff.

50. Plaintiff is entitled to injunctive relief as follows:

    a. An injunction barring defendants from restricting plaintiff's access to the Ultrasound Guided Regional Anesthesia and Vascular Access Workshop scheduled for the Paris Hotel & Casino on January 25, 2013;

    b. An injunction barring defendants from enforcing or attempting to enforce the purported ejection and refusal of reentry transmitted to plaintiff, or issuing any further such directives or restrictions to the plaintiff; and

c. A mandatory injunction compelling Caesars and Operating to transmit to all casinos affiliated with Caesars a retraction of all trespass warnings or restrictions on entry that purport to restrict or provide penalties for plaintiff's entry or reentry upon any casino affiliated with Caesars.

AD DAMNUM

WHEREFORE plaintiff prays for judgment in an amount to be determined by the trier of fact in excess of $10,000.00, together with declaratory relief and injunctive relief as requested in the causes of action set forth above.

Dated this 24th day of July, 2012.

Nersesian & Sankiewicz

/s/ Robert A. Nersesian

Robert A. Nersesian
Nevada Bar No. 2762
528 S. Eighth Street
Las Vegas, Nevada 89101
Telephone: 702-385-5454
Facsimile: 702-385-7667
email: vegaslegal@aol.com
Attorneys for Plaintiff

EXHIBIT 1

EXHIBIT 1

UPDATE YOUR PROFILE?

In This Section

WEBINARS

MEETINGS / EVENTS

FDA MEDWATCH ALERTS

ASA FEATURED PRODUCT

SKU: 30702-12CE

Single Copies, Member Price:
$300

Ultrasound Guided Regional Anesthesia and Vascular Access Workshop

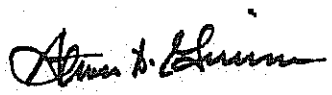
LOCATION
LAS VEGAS, NEVADA
UNITED STATES OF AMERICA
AT:
PARIS

Ultrasound Guided Regional Anesthesia and Vascular Access Workshop

Sponsored by: A Webb Robert for continuing medical Education, Dallas, Texas and Northwest Anesthesia Seminars, Inc

Name:	Northwest Anesthesia Seminars
Dept / Institution	
Address (Line 1):	P.O. Box 2797
Address (Line 2)	
Suite / Mail Stop:	
City:	Pasco
State:	Washington
Country:	United States of America
Zip:	99302
Telephone:	(800) 222-0927
Fax:	(509) 547-1265
E-Mail:	
Website:	

Electronically Filed
02/05/2013 11:27:39 AM



CLERK OF THE COURT

ORDR
JAMES E. WHITMIRE, ESQ.
Nevada Bar No. 6533
jwhitmire@santoronevada.com
JASON D. SMITH, ESQ.
Nevada Bar No. 9691
jsmith@santoronevada.com
SANTORO WHITMIRE
10100 W. Charleston Blvd., Suite 250
Las Vegas, Nevada 89135
Telephone: 702/948-8771
Facsimile: 702/948-8773

Attorneys for Defendants

DISTRICT COURT

CLARK COUNTY, NEVADA

DR. JOEL SLADE, Plaintiff, v. CAESARS ENTERTAINMENT CORPORATION, PARIS LAS VEGAS OPERATING COMPANY, LLC, d/b/a PARIS LAS VEGAS, and CAESARS ENTERTAINMENT OPERATING COMPANY, INC. Defendants.	Case No: A-12-665676-C Dept. No.: XIX **ORDER GRANTING DEFENDANTS' MOTION TO DISMISS COMPLAINT** **Hearing Date: January 17, 2013** **Hearing Time: 9:00 a.m.**

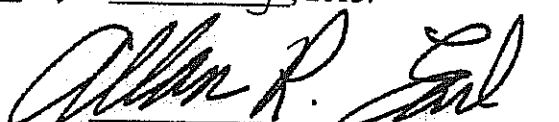
Defendants CAESARS ENTERTAINMENT CORPORATION, PARIS LAS VEGAS OPERATING COMPANY, LLC, and CAESARS ENTERTAINMENT OPERATING COMPANY, INC., by and through their attorneys of record, James E. Whitmire, Esq. and Jason D. Smith, Esq., of the law firm of SANTORO WHITMIRE, and Plaintiff DR. JOEL SLADE, by and through his counsel of record, Robert A. Nersesian, Esq., of the law firm of Nersesian & Sankiewicz, having appeared before the Court regarding Defendants' Motion to Dismiss Complaint, the Court having being fully apprised in the premises, having reviewed the pleadings and papers on file herein, having considered the arguments of counsel, and good cause appearing,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT Defendants'

01-31-13P03:04 RCVD

Motion to Dismiss Complaint is **GRANTED**. Plaintiff's Complaint is hereby dismissed, with prejudice, in its entirety.

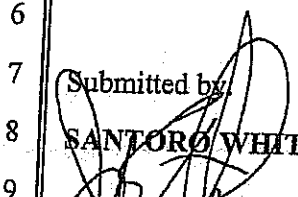
IT IS SO ORDERED this 4th day of February, 2013.



DISTRICT COURT JUDGE

Submitted by:

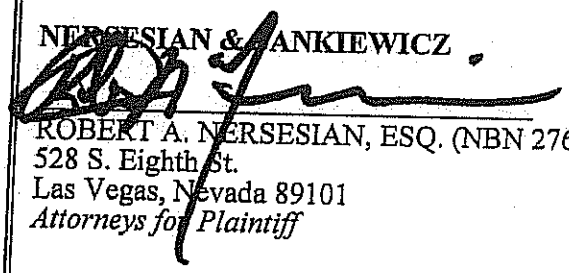
SANTORO WHITMIRE



JAMES E. WHITMIRE, ESQ. (NBN 6533)
JASON D. SMITH, ESQ. (NBN 9691)
10100 W. Charleston Blvd., Suite 250
Las Vegas, Nevada 89135
Attorneys for Defendants

Approved as to form:

NERSESIAN & SANKIEWICZ



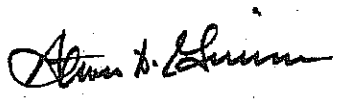
ROBERT A. NERSESIAN, ESQ. (NBN 2762)
528 S. Eighth St.
Las Vegas, Nevada 89101
Attorneys for Plaintiff

SANTORO WHITMIRE
10100 W. Charleston Blvd., Suite 250, Las Vegas, Nevada 89135
(702) 948-8771 – fax (702) 948-8773

NOEJ
JAMES E. WHITMIRE, ESQ.
Nevada Bar No. 6533
jwhitmire@santoronevada.com
JASON D. SMITH, ESQ.
Nevada Bar No. 9691
jsmith@santoronevada.com
SANTORO WHITMIRE
10100 W. Charleston Blvd., Suite 250
Las Vegas, Nevada 89135
Telephone: 702/948-8771
Facsimile: 702/948-8773

Attorneys for Defendants

Electronically Filed
02/06/2013 04:11:33 PM



CLERK OF THE COURT

DISTRICT COURT

CLARK COUNTY, NEVADA

DR. JOEL SLADE, Plaintiff, v. CAESARS ENTERTAINMENT CORPORATION, PARIS LAS VEGAS OPERATING COMPANY, LLC, d/b/a PARIS LAS VEGAS, and CAESARS ENTERTAINMENT OPERATING COMPANY, INC. Defendants.	Case No: A-12-665676-C Dept. No.: XIX **NOTICE OF ENTRY OF ORDER GRANTING DEFENDANTS' MOTION TO DISMISS COMPLAINT**

PLEASE TAKE NOTICE that on February 4, 2013 the Court entered an Order Granting Defendants' Motion to Dismiss Complaint, a copy of which is attached hereto.

DATED this 6 day of February, 2013.

SANTORO WHITMIRE

JAMES E. WHITMIRE, ESQ.
Nevada Bar No. 6533
JASON D. SMITH, ESQ.
Nevada Bar No. 9691
10100 W. Charleston Blvd., Suite 250
Las Vegas, Nevada 89135

Attorneys for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on the 6th day of February, 2013, and pursuant to NRCP 5(b), a true and correct copy of the foregoing **NOTICE OF ENTRY OF ORDER GRANTING DEFENDANTS' MOTION TO DISMISS COMPLAINT**, was served by depositing same for mailing in the U.S. Mail, postage prepaid to the following:

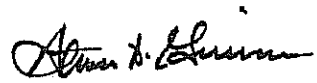
Robert A. Nersesian, Esq.
NERSESIAN & SANKIEWICZ
528 S. Eighth Street
Las Vegas, Nevada 89101

Attorneys for Plaintiff

An employee of SANTORO WHITMIRE

SANTORO WHITMIRE
10100 W. Charleston Blvd., Suite 250, Las Vegas, Nevada 89135
(702) 948-8771 - fax (702) 948-8773

Electronically Filed
02/05/2013 11:27:39 AM



CLERK OF THE COURT

ORDR
JAMES E. WHITMIRE, ESQ.
Nevada Bar No. 6533
jwhitmire@santoronevada.com
JASON D. SMITH, ESQ.
Nevada Bar No. 9691
jsmith@santoronevada.com
SANTORO WHITMIRE
10100 W. Charleston Blvd., Suite 250
Las Vegas, Nevada 89135
Telephone: 702/948-8771
Facsimile: 702/948-8773

Attorneys for Defendants

DISTRICT COURT

CLARK COUNTY, NEVADA

DR. JOEL SLADE, Plaintiff, v. CAESARS ENTERTAINMENT CORPORATION, PARIS LAS VEGAS OPERATING COMPANY, LLC, d/b/a PARIS LAS VEGAS, and CAESARS ENTERTAINMENT OPERATING COMPANY, INC. Defendants.	Case No: A-12-665676-C Dept. No.: XIX **ORDER GRANTING DEFENDANTS' MOTION TO DISMISS COMPLAINT** **Hearing Date: January 17, 2013** **Hearing Time: 9:00 a.m.**

Defendants CAESARS ENTERTAINMENT CORPORATION, PARIS LAS VEGAS OPERATING COMPANY, LLC, and CAESARS ENTERTAINMENT OPERATING COMPANY, INC., by and through their attorneys of record, James E. Whitmire, Esq. and Jason D. Smith, Esq., of the law firm of SANTORO WHITMIRE, and Plaintiff DR. JOEL SLADE, by and through his counsel of record, Robert A. Nersesian, Esq., of the law firm of Nersesian & Sankiewicz, having appeared before the Court regarding Defendants' Motion to Dismiss Complaint, the Court having being fully apprised in the premises, having reviewed the pleadings and papers on file herein, having considered the arguments of counsel, and good cause appearing,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT Defendants'

SANTORO WHITMIRE
10100 W. Charleston Blvd., Suite 250, Las Vegas, Nevada 89135
(702) 948-8771 – fax (702) 948-8773

Motion to Dismiss Complaint is **GRANTED**. Plaintiff's Complaint is hereby dismissed, with prejudice, in its entirety.

IT IS SO ORDERED this 4TH day of February, 2013.

DISTRICT COURT JUDGE

Submitted by:

SANTORO WHITMIRE

JAMES E. WHITMIRE, ESQ. (NBN 6533)
JASON D. SMITH, ESQ. (NBN 9691)
10100 W. Charleston Blvd., Suite 250
Las Vegas, Nevada 89135
Attorneys for Defendants

Approved as to form:

NERSESIAN & SANKIEWICZ

ROBERT A. NERSESIAN, ESQ. (NBN 2762)
528 S. Eighth St.
Las Vegas, Nevada 89101
Attorneys for Plaintiff

SANTORO WHITMIRE
10100 W. Charleston Blvd., Suite 250, Las Vegas, Nevada 89135
(702) 948-8771 - fax (702) 948-8773