

IN THE SUPREME COURT OF THE STATE OF NEVADA

McDONALD CARANO WILSON LLP, a Nevada
limited liability partnership,

Appellant,

vs.

THE BOURASSA LAW GROUP, LLC, a Nevada
limited liability corporation; OASIS LEGAL
FINANCE, LLC, an Illinois limited liability
company; CALIFORNIA BACK SPECIALISTS
MEDICAL GROUP, INC., a California
corporation; CALIFORNIA MINIMALLY
INVASIVE SURGERY CENTER, INC., a
California corporation; THOUSAND OAKS
SPINE MEDICAL GROUP, INC., a California
corporation; CONEJO NEUROLOGICAL
MEDICAL GROUP, INC., a California
corporation; and MEDICAL IMAGING
MEDICAL GROUP INC., a California
corporation,

Respondents.

No. 64658

Electronically Filed
Jan 13 2014 02:50 p.m.
DOCKETING STATEMENT
Tracie K. Lindeman
CIVIL APPEALS Clerk of Supreme Court

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 Moran v. Bonneville Square Assocs., 117 Nev. 525, 25 P.3d 898 (2001); KDI Sylvan Pools v. Workman, 107 Nev. 340, 810 P.2d 1217 (1991). Please use tab dividers to separate any attached documents.

1. Judicial District: Eighth Department: XXVIII
County: Clark Judge: Ronald Israel
District Court Docket No.: A-11-651563-C

2. Attorney filing this docket statement:

Attorney Patrick J. Murch Telephone (702) 873-4100
Firm McDonald Carano Wilson LLP
Address 2300 West Sahara Avenue, Suite 1200
Las Vegas, Nevada 89102
Client(s) McDonald Carano Wilson LLP

If this is a joint statement completed on behalf of 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. N/A

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

Attorney Mark J. Bourassa, Esq., and Christopher W. Carson, Esq. Telephone (702) 851-2180
Firm Bourassa Law Group, LLC
Address 8668 Spring Mountain Road
Las Vegas, Nevada 89117

Client(s) The Bourassa Law Group, LLC (the "Bourassa Firm")

Attorney Michelle L. Abrams, Esq. Telephone (702) 851-2180
Firm Abrams Probate & Planning Group
Address 530 South Fourth Street
Las Vegas, Nevada 89101

Client(s) Oasis Legal Finance, LLC ("Oasis")

Attorney Jacqueline Mary McQuigg, Esq. Telephone (702) 925-8701
Firm The Law Offices of Jacqueline Mary McQuigg & Associates
Address 2620 Regatta Drive Suite #102
Las Vegas, Nevada 89129

and

Attorney James T. Studer, Esq. Telephone (805) 582-9191
Firm James Studer & Associates
Address 2513 Morley Street
Simi Valley, California 93065

Client(s) California Back Specialists Medical Group, Inc.
California Minimally Invasive Surgery Center, Inc.
Thousand Oaks Spine Medical Group, Inc.
Conejo Neurological Medical Group, Inc.
Medical Imaging Medical Group, Inc. (collectively, the "Chiu Entities")¹

¹ The Chiu Entities are owned and/or controlled by John C. Chiu, M.D., a California surgeon.

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

Judgment after bench trial
Judgment after jury verdict
Summary judgment
Default Judgment
Dismissal

Lack of jurisdiction
Failure to state a claim
Failure to prosecute
Other

Grant/Denial of NRCP 60(b) relief
Grant/Denial of injunction
Grant/Denial of declaratory relief
Review of agency determination
Divorce decree:

Original Modification

X Other disposition (specify)

Order granting motion for disbursement
of interpleader funds and denying
countermotion for adjudication of
attorney's lien and disbursement of
interpleader funds

5. **Does this appeal raise issues concerning any of the following:** No.

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: N/A

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: N/A

8. **Nature of the action.** Briefly describe the nature of the action, including a list of the causes of action pleaded, and the result below:

In December 2007, Robert Cooper ("Cooper") and McDonald Carano executed a written agreement, pursuant to which Cooper engaged McDonald Carano to represent him in connection with a negligence lawsuit against ABC Union Cab Company ("Union Cab") in Clark County, Nevada. The suit arose out of injuries that Cooper allegedly suffered after being involved in an automobile accident while being transported in a taxicab owned by Union Cab. Cooper obtained in excess of \$300,000.00 in medical services from a number of medical specialists (collectively, the "Medical Providers") to treat his injuries. Certain of the Medical Providers, identified above as the Chiu Entities, are respondents to this appeal. Another respondent to this appeal, Oasis, advanced funds to Cooper in exchange for an assignment of an interest in any judgment or settlement recovered by Cooper in connection with the personal injury suit.

McDonald Carano prosecuted the personal injury suit on Cooper's behalf for approximately three years, during which time it incurred in excess of \$100,000.00 in legal fees and \$13,456.62 in costs in connection with removing the case from the court-annexed arbitration program, discovery and depositions, motion practice, settlement negotiations, and other matters that were necessary to the representation.

In October 2010, the district court granted McDonald Carano's motion to withdraw from representing Cooper, on the grounds that the relationship between McDonald Carano and Cooper had broken down. The next day, McDonald Carano filed an attorney charging lien and recorded it in the

Office of the Recorder of Clark County, Nevada, pursuant to which it asserted a lien on any settlement or judgment recovered by Cooper in connection with the personal injury suit. McDonald Carano also caused copies of the recorded lien to be served on Cooper and counsel for Union Cab in accordance with NRS 18.015.

Thereafter, Cooper retained the Bourassa Firm to represent him in the personal injury action. Shortly before trial, Cooper and Union Cab agreed to settle the case for \$55,000.00 (the "Settlement Proceeds"). Immediately upon learning of the settlement, McDonald Carano mailed a copy of its charging lien to the Bourassa Firm.

The Bourassa Firm then filed a complaint in interpleader to adjudicate the rights of the potential claimants to the Settlement Proceeds, naming McDonald Carano, the Medical Providers (including all of the Chiu Entities), certain other medical specialists, and Oasis as defendants.² McDonald Carano filed an answer to the complaint in interpleader, and asserted a counterclaim against the Bourassa Firm and cross-claims against all of the other defendants, based on McDonald Carano's charging lien.

After the Bourassa Firm and McDonald Carano obtained default judgments against certain of the Medical Providers and voluntarily dismissed other defendants who did not treat Cooper in connection with the taxicab accident, the Bourassa Firm filed a motion for disbursement of the Settlement Proceeds, and McDonald Carano filed a countermotion for disbursement of the same and for adjudication of its charging lien.

The district court conducted several hearings before ultimately granting the Bourassa Firm's motion and denying McDonald Carano's countermotion. In doing so, the court held that, under Argentina v. Jolley Urga, et al., 125 Nev. 527, 216 P.3d 779 (2009), McDonald Carano did not have an enforceable charging lien or any right to the Settlement Proceeds because it voluntarily withdrew from representing Cooper prior to settlement of the personal injury litigation. On December 6, 2013, the court entered an Amended Disbursement Order granting the Bourassa Firm's motion, denying McDonald Carano's countermotion, and disposing of all issues in the case.

McDonald Carano appeals from the Amended Disbursement Order.

9. Issues on appeal. State concisely the principal issue(s) in this appeal:

Whether an attorney who voluntarily withdraws from representing a client prior to settlement or judgment can enforce an attorney charging lien against a judgment or settlement proceeds that are recovered by the client after the attorney's withdrawal.

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

11. Constitutional issues. If this appeal challenges the constitutionality of any 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 x Yes No

² Because of the minimal amount of the Settlement Proceeds relative to the claims of the attorneys, the Medical Providers, and Oasis, Cooper was not made a party to the interpleader action. He has no claims to any amount of the Settlement Proceeds.

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

Reversal of well-settled Nevada precedent (on an attachment, identify the case(s))

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

A substantial issue of first-impression

X An issue of public policy

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

A ballot question

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

14. Judicial disqualification. Do you intend to file a motion to disqualify or have a justice recuse him/herself from participation in this appeal. No. If so, which Justice?

TIMELINESS OF NOTICE OF APPEAL

15. Date of entry of written judgment or order appealed from December 6, 2013.³

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 served December 10, 2013.

(a) Was service by delivery _____ or by mail _____ x _____ (specify).

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, and the date and method of service of the motion, and the date of filing. N/A

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 _____

³ The district court conducted a hearing on the Bourassa Firm's motion and McDonald Carano's countermotion on May 14, 2013, but the original order on the motion and countermotion was not entered until September 12, 2013. Prior to the deadline for McDonald Carano to file a notice of appeal relative to the original order, the district court directed the parties to submit additional briefing to address this Court's holding in Leventhal v. Black & LoBello, ___ Nev. ___, 305 P.3d 907 (2013) and the recent legislative changes to the Nevada attorney's lien statute (NRS 18.015), both of which occurred between the May hearing and the date of entry of the original order. In addition, in October 2013, McDonald Carano filed a motion in this Court, requesting that the Court reissue, as a published opinion, the Order of Reversal that was entered in Supreme Court Case No. 57759. After this Court entered an order denying McDonald Carano's motion, the parties stipulated to the entry of an amended order that fully and finally adjudicated the Bourassa Firm's motion and McDonald Carano's countermotion. The amended order (from which McDonald Carano appeals) is attached as Exhibit A. The original order (a portion of which is incorporated in the amended order by reference) is attached as Exhibit A-1.

- (c) Date written notice of entry of order resolving tolling motion was served _____
Was service by: Delivery _____ or Mail _____

18. Date notice of appeal was filed December 12, 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: N/A

19. Specify statute or rule governing the time limit for filing the notice of appeal, e.g., NRAP 4(a), NRS 155.190, 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)

NRCP 3A(b)(1) X NRS 155.190 _____ (specify subsection) _____
NRCP 3A(b)(2) _____ NRS 38.205 _____ (specify subsection) _____
NRCP 3A(b)(3) _____ NRS 703.376 _____
Other (specify) _____

(b) Explain how each authority provides a basis for appeal from the judgment or order:

NRAP 3A(b)(1) provides that an appeal may be taken from "a final judgment entered in an action or proceeding commenced in the court in which the judgment is rendered." The district court's amended order on the Bourassa Firm's motion and McDonald Carano's countermotion is the final judgment entered in the interpleader action.

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

(a) Parties:

Plaintiff: The Bourassa Law Group, LLC

Defendants: McDonald Carano Wilson LLP

Oasis Legal Finance, LLC

California Back Specialists Medical Group, Inc. ("California Back")

California Minimally Invasive Surgery Center, Inc.

Conejo Neurological Medical Group, Inc. ("Conejo Neurological")

Los Angeles Orthopaedic Institute, Inc.

Medical Imaging Medical Group, Inc. ("Medical Imaging")

Mountain View Surgical Center, Inc.

Charles K. Neal

Quest Diagnostic West Hills, Inc.

Screen Actors Guild, Inc.

Thousand Oaks Spine Medical Group, Inc. ("Thousand Oaks Spine")

Steven Zlatt, M.D., Inc.

Imaging Center of the Valley at Sherman Oaks Community Hospital, Ltd., a Cal. LP

Valley Open MRI, LLC

- (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:

Only The Bourassa Firm, McDonald Carano, Oasis, and the Chiu Entities (California Back, California Minimally Invasive Surgery Center, Conejo Neurological, Medical Imaging, and Thousand Oaks Spine) are parties to this appeal. With the exception of Valley Open MRI, LLC, which was not served with any pleadings because it was out of business at the time that the interpleader action was filed, all claims against the other parties to the district court litigation were either voluntarily dismissed or adjudicated by default judgment.

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.

Each of the parties to this appeal claimed an interest in some amount of the Settlement Proceeds. McDonald Carano also asserted a claim for adjudication of its attorney charging lien. None of the other parties to the underlying litigation asserted any claims. All claims were fully and finally adjudicated on December 6, 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 X No

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

- (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)): N/A

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

- The latest-filed complaint, counterclaims, cross-claims, and third-party claims⁴
- Any tolling motion(s) and order(s) resolving tolling motion(s)
- Orders of NRCP 42(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 appeal⁵

⁴ See Exhibits B (the Bourassa Firm's complaint) and B-1 (McDonald Carano's answer, counterclaim, and cross-claims).

- Any other order challenged on appeal⁶
 - Notices of entry for each attached order⁷
-

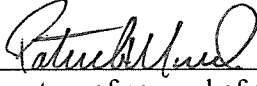
VERIFICATION

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.

McDonald Carano Wilson LLP
Name of appellant

January 10, 2014
Date

Clark County, Nevada
State and county where signed

Patrick J. Murch
Name of counsel of record

Signature of counsel of record

⁵ See Exhibits C (the Bourassa Firm's default judgment against Los Angeles Orthopaedic Institute, Inc.); C-1 (the Bourassa Firm's default judgment against Imaging Center of the Valley at Sherman Oaks Community Hospital, Ltd.); C-2 (the Bourassa Firm's default judgment against Steven Zlatt, M.D., Inc.); C-3 (McDonald Carano's default judgments against Los Angeles Orthopaedic Institute, Inc., Imaging Center of the Valley at Sherman Oaks Hospital, Ltd., a California LP, and Steven Zlatt, M.D., Inc.); C-4 (the Bourassa Firm's voluntary dismissal of Screen Actors Guild, Inc.); C-5 (McDonald Carano's voluntary dismissal of Screen Actors Guild, Inc.); C-6 (the Bourassa Firm's voluntary dismissal of Quest Diagnostics West Hills); C-7 (McDonald Carano's voluntary dismissal of Quest Diagnostics West Hills); C-8 (the Bourassa Firm's voluntary dismissal of Charles K. Neal, M.D.); C-9 (McDonald Carano's voluntary dismissal of Charles K. Neal, M.D.); C-10 (the Bourassa Firm's voluntary dismissal of Mountain View Surgical Center, Inc.); and C-11 (McDonald Carano's voluntary dismissal of Mountain View Surgical Center, Inc.).

⁶ See Exhs. A and A-1.

⁷ See Exhibits D (the Bourassa Firm's notice of entry of default judgment against Los Angeles Orthopaedic Institute, Inc.); D-1 (the Bourassa Firm's notice of entry of default judgment against Imaging Center of the Valley at Sherman Oaks Community Hospital, Ltd.); D-2 (the Bourassa Firm's notice of entry of default judgment against Steven Zlatt, M.D., Inc.); D-3 (McDonald Carano's notice of entry of default judgments against Los Angeles Orthopaedic Institute, Inc., Imaging Center of the Valley at Sherman Oaks Hospital, Ltd., a California LP, and Steven Zlatt, M.D., Inc.); D-4 (notice of entry of Original Disbursement Order); and D-5 (notice of entry of Amended Disbursement Order).

CERTIFICATE OF SERVICE

I certify that on January 10, 2014, 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:

Mark J. Bourassa, Esq.
Christopher W. Carson, Esq.
The Bourassa Law Group, LLC
8668 Spring Mountain Road, Suite 101
Las Vegas, Nevada, 89117
Attorneys for The Bourassa Law Group, LLC

Michelle L. Abrams, Esq.
Abrams Probate & Planning Group
530 South Fourth Street
Las Vegas, Nevada 89101
Attorney for Oasis Legal Finance, LLC

Jacqueline Mary McQuigg, Esq.
Law Offices of Jacqueline Mary McQuigg, Esq.
2620 Regatta Drive, Suite 102
Las Vegas, Nevada 89128

and

James T. Studer, Esq.
James Studer & Associates
2513 Morley Street
Simi Valley, California, 93065
Attorneys for the Chiu Entities

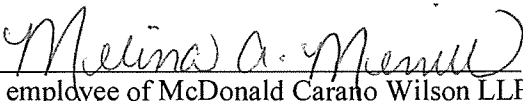
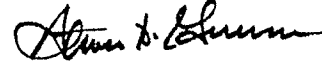

An employee of McDonald Carano Wilson LLP

Exhibit A



CLERK OF THE COURT

1 **SAO**
2 GEORGE F. OGILVIE III, ESQ.
3 Nevada Bar No. 3552
4 PATRICK J. MURCH, ESQ.
5 Nevada Bar No. 10162
6 McDONALD CARANO WILSON LLP
7 2300 West Sahara Avenue, Suite 1200
8 Las Vegas, Nevada 89102
9 pmurch@mcdonaldcarano.com
10 Telephone: (702) 873-4100
11 Facsimile: (702) 873-9966
12 *Attorneys for McDonald Carano Wilson LLP*

9 **DISTRICT COURT**

10 **CLARK COUNTY, NEVADA**

11 THE BOURASSA LAW GROUP, LLC

12 Plaintiff,

13 vs.

14 CALIFORNIA BACK SPECIALISTS MEDICAL
15 GROUP, INC., a California corporation;
16 CALIFORNIA MINIMALLY INVASIVE
17 SURGERY CENTER, an unknown entity;
18 CONEJO NEUROLOGICAL MEDICAL
19 GROUP, INC., a California corporation; LOS
20 ANGELES ORTHOPAEDIC INSTITUTE, INC.,
21 a California corporation; MEDICAL IMAGING
22 MEDICAL GROUP, an unknown entity;
23 MOUNTAIN VIEW SURGICAL CENTER, INC.,
24 a California corporation; CHARLES K. NEAL, an
25 individual; QUEST DIAGNOSTICS WEST
26 HILLS, a foreign Delaware corporation; SCREEN
27 ACTORS GUILD, INC., a California corporation;
THOUSAND OAKS SPINE MEDICAL GROUP,
INC., a California corporation; STEVEN ZLATT,
M.D., INC., a California corporation; OASIS
LEGAL FINANCE, LLC, a foreign Illinois limited
liability company; McDONALD CARANO
WILSON LLP, a Nevada limited liability
partnership; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS COMMUNITY
HOSPITAL, LTD., A CALIFORNIA LP, a
California limited partnership; VALLEY OPEN
MRI, LLC, a California limited liability company;
and DOES I-V, inclusive; and ROE
CORPORATIONS VI-X, inclusive,

28 Defendants.

Case No.: A651563

Dept. No.: XXVIII

**STIPULATION AND ~~PROPOSED~~
AMENDED ORDER GRANTING THE
BOURASSA LAW GROUP LLC'S
MOTION FOR DISBURSEMENT OF
INTERPLEADER FUNDS;**

AND

**DENYING McDONALD CARANO
WILSON LLP'S COUNTERMOTION FOR
ADJUDICATION OF ATTORNEY'S LIEN
AND DISBURSEMENT OF
INTERPLEADER FUNDS**

12/6/13 (28)

1 McDONALD CARANO WILSON LLP, a Nevada
2 limited liability partnership,

3 Counterclaimant,

4 vs.

5 THE BOURASSA LAW GROUP, LLC, a Nevada
6 limited liability company; and DOES I-V,
7 inclusive; and ROE CORPORATIONS VI-X,
8 inclusive,

8 Counterclaim Defendants.

9 McDONALD CARANO WILSON LLP, a Nevada
10 limited liability partnership,

11 Cross-Claimant,

12 vs.

13 CALIFORNIA BACK SPECIALISTS MEDICAL
14 GROUP, INC., a California corporation;
15 CALIFORNIA MINIMALLY INVASIVE
16 SURGERY CENTER, an unknown entity;
17 CONEJO NEUROLOGICAL MEDICAL
18 GROUP, INC., a California corporation; LOS
19 ANGELES ORTHOPAEDIC INSTITUTE, INC.,
20 a California corporation; MEDICAL IMAGING
21 MEDICAL GROUP, an unknown entity;
22 MOUNTAIN VIEW SURGICAL CENTER, INC.,
23 a California corporation; CHARLES K. NEAL, an
24 individual; QUEST DIAGNOSTICS WEST
25 HILLS, a foreign Delaware corporation; SCREEN
26 ACTORS GUILD, INC., a California corporation;
27 THOUSAND OAKS SPINE MEDICAL GROUP,
28 INC., a California corporation; STEVEN ZLATT,
M.D., INC., a California corporation; OASIS
LEGAL FINANCE, LLC, a foreign Illinois limited
liability company; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS COMMUNITY
HOSPITAL, LTD., A CALIFORNIA LP, a
California limited partnership; VALLEY OPEN
MRI, LLC, a California limited liability company;
and DOES I-V, inclusive; and ROE
CORPORATIONS VI-X, inclusive,

Cross-Claim Defendants.

1 Plaintiff/Counterclaim Defendant The Bourassa Law Group, LLC (the "Bourassa Firm"),
2 Defendant/Counterclaimant/Cross-Claimant McDonald Carano Wilson LLP ("McDonald
3 Carano"), and Defendant/Cross-Claim Defendant Oasis Legal Finance, LLC ("Oasis"), by and
4 through their respective undersigned counsel, stipulate and agree as follows:

5 **A. Original Disbursement Order.**

6 This matter originally came before the Court on April 16, 2013, on the Bourassa Firm's
7 Motion for Distribution of Interpleader Funds ("Motion") and McDonald Carano's
8 Countermotion for Adjudication of Attorney's Lien and Disbursement of Interpleader Funds
9 ("Countermotion"). Mark J. Bourassa appeared on behalf of the Bourassa Firm, Patrick J. Murch
10 and Rory T. Kay appeared on behalf of McDonald Carano, and Michelle Abrams appeared on
11 behalf of Oasis.¹

12 At the April 16 hearing, the Court directed the parties to submit supplemental briefs to
13 address the attorney charging lien issues raised in Argentea v. Jolley Urga, et al., 125 Nev. 527,
14 216 P.3d 779 (2009). The hearing was continued to May 14, 2013.

15 At the May 14 hearing, after considering all of the parties' respective written and oral
16 arguments, the Court made the following findings of fact:

17 On or about December 10, 2005, while riding as a passenger in a taxicab
18 owned and operated by ABC Union Cab Co., Robert Cooper ("Cooper") was
19 involved in an automobile accident in Las Vegas, Nevada. Subsequently, Cooper
20 received medical treatment and/or services related to the automobile accident
21 from various providers.

22 Initially, Cooper retained and was represented by McDonald Carano in a
23 personal injury suit against Union Cab. However, McDonald Carano, on its own
24 motion, withdrew from the underlying case prior to any settlement or judgment
25 being obtained. Immediately thereafter, pursuant to NRS 18.015, McDonald
26 Carano caused an attorney's lien to be recorded in the Office of the Recorder of
27 Clark County, Nevada. Cooper then retained the Bourassa Firm on a contingent
28 basis of 40 percent of the total settlement before deduction of costs or expenses.

26 ¹ Defendants/Cross-Claim Defendants California Back Specialists Medical Group, Inc., California
27 Minimally Invasive Surgery Center, Thousand Oaks Spine Medical Group, Inc., Conejo
28 Neurological Medical Group, or Medical Imaging Medical Group, Inc. (collectively, the "Chiu
Entities") filed their joint answer to the Bourassa Firm's complaint in May 2012. The Chiu
Entities did not file any other documents in this litigation, nor did they appear at any of the
hearings referenced herein.

1 The Bourassa Firm subsequently obtained a settlement on Cooper's behalf in the
2 total amount of \$55,000.00, and incurred costs of \$30.89.

3 The medical bills incurred by Cooper substantially exceeded the
4 settlement amount. Accordingly, the Bourassa Firm filed the instant interpleader
5 action and subsequently, its Motion on or about March 20, 2013. On or about
6 March 29, 2013, Oasis filed a Joinder in the Bourassa Firm's Motion. On or
7 about April 1, 2013, McDonald Carano filed its Countermotion in conjunction
8 with its Opposition to the Bourassa Firm's Motion.

9 See Order Granting [the Bourassa Firm]'s Motion for Disbursement of Interpleader Funds;
10 and Denying McDonald Carano Wilson LLP's Countermotion for Adjudication of Attorney's
11 Lien and Disbursement of Interpleader Funds (the "Original Disbursement Order") (filed Sept. 16,
12 2013), on file with the Court.

13 The Court also made the following conclusions of law:

14 ...

15 A[n] attorney] Charging Lien is a lien on the judgment or settlement that
16 the attorney has obtained for the client. Argentina, 216 P.3d at 783-784
17 (Citations omitted). Following McDonald Carano's withdrawal, the Bourassa
18 Firm represented Cooper in the underlying matter on a contingency basis of 40
19 percent before the deduction of costs or expenses. Because the Bourassa Firm
20 was representing Cooper at the time of settlement, the Bourassa Firm has a
21 charging lien on the settlement funds and is entitled to enforce its charging lien
22 against the settlement proceeds for its attorney fees in the amount of \$22,000.00,
23 plus costs of \$30.89.

24 It is undisputed that McDonald Carano withdrew from representing
25 Cooper prior to any settlement being obtained. It is also undisputed that
26 McDonald Carano did not obtain any settlement on behalf of Cooper.
27 Accordingly, based on the plain reading of the definition of a Charging Lien
28 under Argentina – "a lien on the judgment or settlement that the attorney has
obtained for the client" – McDonald Carano cannot have a charging lien because
McDonald Carano withdrew from the Cooper matter prior to any settlement being
obtained and did not obtain a settlement for the client. Id.

Based on the above, McDonald Carano is not entitled to recover any
attorney fees or costs under a theory of a Charging Lien. See Original
Disbursement Order.

...

1 A Retaining Lien allows a discharged attorney to withhold the client's file
 2 and other property until the court, at the request or consent of the client,
 3 adjudicates the client's rights and obligations with respect to the lien. [Argentena,
 216 P.3d] at 782.

4 In this instance, McDonald Carano did not retain Cooper's file or property.
 5 Accordingly, no Retaining Lien exists and therefore cannot be enforced.

6 IT IS THEREFORE ORDERED that the Bourassa Law Group, LLC be awarded
 7 its requested attorney fees in the amount [of] \$22,000.00, calculated as 40 percent
 8 of the total settlement before the deduction of costs and expenses, plus costs in the
 amount of \$30.89, and that the sum of \$22,030.89 shall be disbursed to The
 Bourassa Law Group, LLC.

9 IT IS FURTHER ORDERED that McDonald Carano be awarded nothing from
 10 the settlement proceeds.

11 IT IS FUTHER ORDERED that the remaining settlement proceeds, after payment
 12 of The Bourassa Law Group, LLC's fees and costs, total \$32,969.11. Those funds
 shall be disbursed on a pro-rata basis between the remaining responding parties,
 as follows:

<u>Claimant</u>	<u>Amount of Claim</u>	<u>Percentage of Total</u> <u>Claim</u>	<u>Amount to be</u> <u>Disbursed</u>
California Back Specialists Medical Group, Inc.	\$85,146.00	34.3553%	\$11,326.64
California Minimally Invasive Surgery Center	\$77,300	31.1896%	\$10,282.93
Thousand Oaks Spine Medical Group, Inc.	\$31,047.50	12.5273%	\$4,130.14
Conejo Neurological Medical Group	\$2,064.00	.8328%	\$274.57
Medical Imaging Medical Group, Inc.	\$10,241.88	4.1325%	\$1,362.45
Oasis Legal Finance, LLC	\$42,040.00	16.9626%	\$5,592.38
TOTAL:	\$247,839.38	100.0%	\$32,969.11

26 The Clerk of the Court shall disburse the settlement proceeds in
 27 accordance with the foregoing within thirty (30) days of the date of entry of this
 Order." See Original Disbursement Order.

1 Although the hearing was conducted in May 2013, the Original Disbursement Order was
2 not signed until September 12. Id. It was filed on September 16. Id. The same day, the Bourassa
3 Firm caused notice of entry of the Original Disbursement Order to be served on the parties via
4 U.S. Mail. See Notice of Entry of [Original Disbursement Order] (filed Sept. 16, 2013), on file
5 with the Court.

6 **B. Procedural History Following Entry of Original Disbursement Order.**

7 On September 19, 2013, counsel for the Bourassa Firm, McDonald Carano, and Oasis
8 submitted a stipulation and proposed order to the Court, wherein they agreed to stay the
9 disbursement of the settlement proceeds pending the resolution of McDonald Carano's anticipated
10 appeal. The Court did not sign the order, but instead entered a separate order directing the parties
11 to appear for a "Hearing on Disbursement of Interpleader Funds" on October 15, 2013. See Order
12 Scheduling Hearing: Disbursement of Interpleader Funds (entered Oct. 15, 2013), on file with the
13 Court.

14 **1. October 15 Hearing.**

15 At the October 15 hearing, the Court entered an oral order staying the Original
16 Disbursement Order and directing the parties to submit supplemental briefs to address whether
17 Leventhal v. Black & LoBello, 129 Nev., Adv. Op. 50 (filed July 11, 2013) or the July 2013
18 amendments to the attorney lien statute had any impact on the Original Disbursement Order. The
19 hearing was continued to November 15.

20 **2. McDonald Carano's Supreme Court Motion.**

21 On October 28, 2013, McDonald Carano filed a motion in the Nevada Supreme Court,
22 seeking an order directing the publication of an unpublished Order of Reversal in Case No. 57759
23 (Hoff v. Walters), on the grounds that the Order of Reversal was directly on point regarding the
24 attorney lien issues raised in the interpleader action. McDonald Carano caused notice of its
25 motion to be served on the parties and the Court on October 29.

1 **3. November 15 Hearing.**

2 On November 15, 2013, the Court held another hearing to address the issues raised in the
3 parties' supplemental briefs. The parties agreed that neither Leventhal nor the recent amendments
4 to NRS 18.015 had any impact on the Original Disbursement Order. In addition, the Court held
5 that because the decision in Leventhal and the amendments to NRS 18.015 occurred between the
6 May 15 hearing and the date of entry of the Original Disbursement Order, all of the parties'
7 supplemental arguments would relate back to the May 15 hearing, and the Court would enter an
8 amended order on the Motion and Countermotion in order to preserve McDonald Carano's appeal
9 rights. None of the parties objected to that determination. The Court also ordered a stay of the
10 interpleader action pending resolution of McDonald Carano's Supreme Court motion. Finally,
11 Mark Bourassa represented that the \$55,000.00 in settlement proceeds had not been deposited
12 with the Clerk of the Court, but remained in the Bourassa Firm's client trust account pending
13 resolution of this matter.

14 **4. Resolution of McDonald Carano's Supreme Court Motion.**

15 On November 22, 2013, the Nevada Supreme Court entered an order denying McDonald
16 Carano's motion for publication. McDonald Carano caused notice of entry of that order to be
17 served on the parties on December 3.

18 Based on the foregoing, the parties stipulate and agree as follows:

19 1. The Court may enter the following Amended Order, which shall incorporate all
20 findings of fact, conclusions of law, and order(s) contained in the Original Disbursement Order,
21 plus all additional stipulated facts contained herein;

22 2. The Amended Order shall supersede and replace the Original Disbursement Order
23 in its entirety;

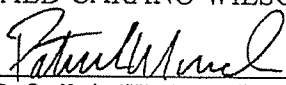
24 3. The date of entry of the following Amended Order disposes of all the issues
25 presented in the case, and shall be the effective date of final judgment in this matter;

26 4. The time period for McDonald Carano to file a notice of appeal shall commence
27 on the effective date of service of notice of entry of the following Amended Order; and
28

5. The settlement proceeds at issue may remain in the Bourassa Firm's client trust account until further order of this Court.

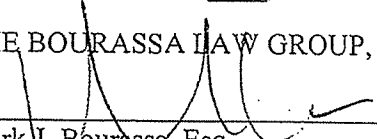
Dated: December 4, 2013.

McDONALD CARANO WILSON LLP


George F. Ogilvie III, Esq. (#3552)
Patrick J. Murch, Esq. (#10162)
2300 West Sahara Avenue, Suite 1200
Las Vegas, Nevada 89102
Attorneys for McDonald Carano Wilson LLP

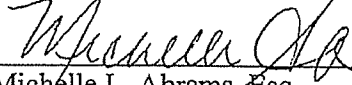
Dated: December 4th, 2013.

THE BOURASSA LAW GROUP, LLC


Mark J. Bourassa, Esq.
Christopher W. Carson, Esq.
8668 Spring Mountain Road, Suite 101
Las Vegas, Nevada 89117
Attorneys for The Bourassa Law Group, LLC

Dated: December 5, 2013.

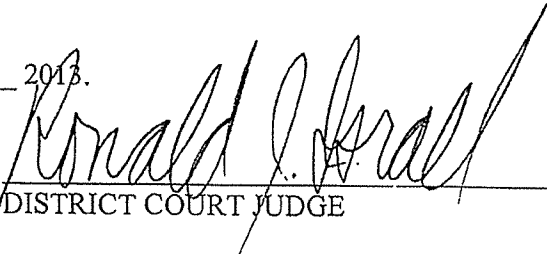
ABRAMS PROBATE & PLANNING GROUP


Michelle L. Abrams, Esq.
530 South Fourth Street
Las Vegas, Nevada 89101
Attorney for Oasis Legal Finance, LLC

AMENDED ORDER

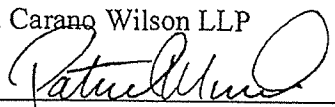
IT IS SO ORDERED.

Dated this 6 day of Dec 2013.


DISTRICT COURT JUDGE

Submitted by:

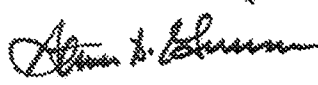
McDonald Carano Wilson LLP

By: 
George F. Ogilvie III Esq. (#3552)
Patrick J. Murch, Esq. (#10162)
2300 West Sahara Avenue, Suite 1200
Las Vegas, Nevada 89102

Attorneys for McDonald Carano Wilson LLP

Exhibit A-1

OGM
MARK J. BOURASSA, ESQ.
Nevada Bar No. 79499
THE BOURASSA LAW GROUP, LLC
8668 Spring Mountain Road, Suite 101
Las Vegas, Nevada 89117
Telephone: (702) 851-2180
Facsimile: (702) 851-2189
mbourassa@bourassalawgroup.com
Attorney for Plaintiff


CLERK OF THE COURT

DISTRICT COURT

CLARK COUNTY, NEVADA

THE BOURASSA LAW GROUP, LLC

Plaintiff.

vs.

CALIFORNIA BACK SPECIALISTS
MEDICAL GROUP, INC., a California
corporation; CALIFORNIA MINIMALLY
INVASIVE SURGERY CENTER, an
unknown entity; CONEJO NEUROLOGICAL
MEDICAL GROUP, INC., a California
corporation; LOS ANGELES
ORTHOPAEDIC INSTITUTE, INC., a
California corporation; MEDICAL IMAGING
MEDICAL GROUP, an unknown entity;
MOUNTAIN VIEW SURGICAL CENTER,
INC., a California corporation; CHARLES K.
NEAL, an individual; QUEST
DIAGNOSTICS WEST HILLS, a foreign
Delaware corporation; SCREEN ACTORS
GUILD, INC., a California corporation;
THOUSAND OAKS SPINE MEDICAL
GROUP, INC., a California corporation;
STEVEN ZLATT, M.D., INC., a California
corporation; OASIS LEGAL FINANCE,
LLC, a foreign Illinois limited liability
company; McDONALD CARANO WILSON
LLP, a Nevada limited liability partnership;
IMAGING CENTER OF THE VALLEY AT
SHERMAN OAKS COMMUNITY
HOSPITAL, LTD., A CALIFORNIA LP, a
California limited partnership; VALLEY
OPEN MRI, LLC, a California limited
liability company; and DOES I-V, inclusive;
and ROE CORPORATIONS VI-X, inclusive.

CASE NO.: A-11-651563-C
DEPT NO.: XXVIII

ORDER GRANTING PLAINTIFF'S
MOTION FOR DISBURSEMENT OF
INTERPLEADER FUNDS;

and

DENYING McDONALD CARANO
WILSON LLP'S COUNTERMOTION
FOR ADJUDICATION OF
ATTORNEY'S LIEN AND
DISBURSEMENT OF
INTERPLEADER FUNDS

Defendants:

<input type="checkbox"/> Voluntary Dis	<input checked="" type="checkbox"/> Dis. Dis	<input checked="" type="checkbox"/> Judgment	FINAL DISPOSITIONS
<input type="checkbox"/> Voluntary (2011) Dis	<input type="checkbox"/> Dis. Dis	<input type="checkbox"/> Judgment Trial	<input type="checkbox"/> New Lien Expired
<input type="checkbox"/> Judgment on Dis. Dis	<input type="checkbox"/> Dis. Dis	<input type="checkbox"/> Jury Trial	<input type="checkbox"/> Dismissed (with or without prejudice)
<input type="checkbox"/> Dis. Dis	<input type="checkbox"/> Dis. Dis		<input type="checkbox"/> Judgment Satisfaction

9/18/13

1 McDONALD CARANO WILSON LLP, a
2 Nevada limited liability partnership.

3 Counterclaimant,

4 vs.

5 THE BOURASSA LAW GROUP, LLC, a
6 Nevada limited liability company; and DOES
7 I-V, inclusive; and ROE CORPORATIONS
8 VI-X, inclusive.

9 Counterclaim Defendants.

10 McDONALD CARANO WILSON LLP, a
11 Nevada limited liability partnership.

12 Cross-Claimant,

13 vs.

14 CALIFORNIA BACK SPECIALISTS
15 MEDICAL GROUP, INC., a California
16 corporation; CALIFORNIA MINIMALLY
17 INVASIVE SURGERY CENTER, an
18 unknown entity; CONEJO NEUROLOGICAL
19 MEDICAL GROUP, INC., a California
20 corporation; LOS ANGELES
21 ORTHOPAEDIC INSTITUTE, INC., a
22 California corporation; MEDICAL IMAGING
23 MEDICAL GROUP, an unknown entity;
24 MOUNTAIN VIEW SURGICAL CENTER,
25 INC., a California corporation; CHARLES K.
26 NEAL, an individual; QUEST
27 DIAGNOSTICS WEST HILLS, a foreign
28 Delaware corporation; SCREEN ACTORS
GUILD, INC., a California corporation;
THOUSAND OAKS SPINE MEDICAL
GROUP, INC., a California corporation;
STEVEN ZIATT, M.D., INC., a California
corporation; OASIS LEGAL FINANCE
LLC, a foreign Illinois limited liability
company; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS
COMMUNITY HOSPITAL, LTD., A
CALIFORNIA LP, a California limited
partnership; VALLEY OPEN MRI, LLC, a
California limited liability company; and
DOES I-V, inclusive; and ROE
CORPORATIONS VI-X, inclusive,

Cross-Claim Defendants.

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

4
5
6
7
8
9
10
11
12

345

1100

22
23
24
25
26
27
28

1 subsequently obtained a settlement on Cooper's behalf in the total amount of \$55,000.00, and
2 incurred costs of \$30.89.

3 The medical bills incurred by Cooper substantially exceeded the settlement amount.
4 Accordingly, Plaintiff filed the instant Interpleader action and subsequently, its Motion on or
5 about March 20, 2013. On or about March 29, 2013, Oasis filed a Joinder in Plaintiff's Motion.
6 On or about April 1, 2013, McDonald Carano filed its Countermotion in conjunction with its
7 Opposition to Plaintiff's Motion.
8

9 A hearing was held on the Motion and Countermotion on April 16, 2013. At this
10 hearing the Honorable Ronald L. Israel requested that the parties conduct further research and
11 prepare and submit supplemental briefs discussing the parties' respective positions regarding
12 *Argentina Consolidated Mining Company v. Jolley Urga Wirth Woodbury & Stundish*, 125
13 Nev. 527, 216 P.3d 779 (Nev. 2009). The parties complied with the Court's Order and a second
14 hearing was held on May 14, 2013.
15

16 CONCLUSIONS OF LAW

17 A. Charging Lien

18 A Charging Lien is a lien on the judgment or settlement that the attorney has obtained
19 for the client. *Argentina*, 216 P. 3d at 783-784 (Citations omitted). Following McDonald
20 Carano's withdrawal, Plaintiff represented Cooper in the underlying matter on a contingency
21 basis of 40 percent before the deduction of costs or expenses. Because Plaintiff was
22 representing Cooper at the time of settlement, Plaintiff has a charging lien on the settlement
23 funds, and is entitled to enforce its charging lien against the settlement proceeds for its attorney
24 fees in the amount of \$22,000.00, plus costs of \$30.89.
25

26 It is undisputed that McDonald Carano withdrew from representing Cooper prior to any
27 settlement being obtained. It is also undisputed that McDonald Carano did not obtain any
28

1 settlement on behalf of Cooper. Accordingly, based on the plain reading of the definition of a
2 Charging Lien under *Argentine* — “a lien on the judgment or settlement that the attorney has
3 obtained for the client” — McDonald Carano cannot have a charging lien because McDonald
4 Carano withdrew from the Cooper matter prior to any settlement being obtained and did not
5 obtain a settlement for the client. *Id.*

6
7 Based on the above, McDonald Carano is not entitled to recover any attorney fees or
8 costs under a theory of a Charging Lien.

9 **B. Retaining Lien**

10 A Retaining Lien allows a discharged attorney to withhold the client's file and other
11 property until the court, at the request or consent of the client, adjudicates the client's rights and
12 obligations with respect to the lien. *Id.* at 782.

13
14 In this instance, McDonald Carano did not retain Cooper's file or property.
15 Accordingly, no Retaining Lien exists and therefore cannot be enforced.

16 IT IS THEREFORE ORDERED that The Bourassa Law Group, LLC be awarded its
17 requested attorney fees in the amount \$22,000.00, calculated as 40 percent of the total
18 settlement before the deduction of costs and expenses, plus costs in the amount of \$30.89, and
19 that the sum of \$22,030.89 shall be disbursed to The Bourassa Law Group, LLC.

20
21 IT IS FURTHER ORDERED that McDonald Carano be awarded nothing from the
22 settlement proceeds.

23 IT IS FURTHER ORDERED that the remaining settlement proceeds, after payment of
24 The Bourassa Law Group, LLC's fees and costs, total \$32,969.11. Those funds shall be
25 disbursed on a pro-rata basis between the remaining responding parties as follows:

26 ///

27 ///

28

<u>Claimant</u>	<u>Amount of Claim</u>	<u>Percentage of Total Claim</u>	<u>Amount to be Disbursed</u>
California Back Specialists Medical Group, Inc.	\$83,146.00	34.36%	\$11,326.64
California Minimally Invasive Surgery Center	\$77,300.00	31.19%	\$10,282.92
Thousand Oaks Spine Medical Group, Inc.	\$31,047.50	12.53%	\$4,130.13
Concjo Neurological Medical Group	\$2,064.00	0.83%	\$274.57
Medical Imaging Medical Group, Inc.	\$10,241.88	4.13%	\$1,362.44
Oasis Legal Finance, LLC	\$42,040.00	16.96%	\$5,592.42
TOTAL:	\$247,839.38	100.00%	\$32,969.11

The Clerk of the Court shall disburse the settlement proceeds in accordance with the foregoing within thirty (30) days of the date of the entry of this Order.

IT IS SO ORDERED.

Dated this 12 day of September, 2013.

Heard & Decided on 5-14-13 RA

Ronald J. Isphel
 Judge Ronald J. Isphel
 District Court Judge, Dept. XXVIII

Respectfully Submitted:

THE BOURASSA LAW GROUP, LLC

MARK J. BOURASSA, ESQ.

Nevada Bar No. 7999

8668 Spring Mountain Road, Suite 101

Las Vegas, Nevada 89117

Attorney for Plaintiff

Exhibit B

1 **CII**
2 MARK J. BOURASSA, ESQ.
3 Nevada Bar No. 7999
4 CHRISTOPHER W. CARSON, ESQ.
5 Nevada Bar No. 9523
6 **THE BOURASSA LAW GROUP, LLC**
7 3025 W. Sahara Ave. Suite 105
8 Las Vegas, Nevada 89102
9 Telephone: (702) 851-2180
10 Facsimile: (702) 851-2189
11 mbourassa@bourassalawgroup.com
12 ccarson@bourassalawgroup.com

13 *Attorneys for Plaintiff*

14 **DISTRICT COURT**
15 **CLARK COUNTY, NEVADA**

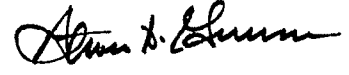
16 THE BOURASSA LAW GROUP, LLC,

17 Plaintiff,

18 vs.

19 CALIFORNIA BACK SPECIALISTS
20 MEDICAL GROUP, INC., a California
21 Corporation; CALIFORNIA MINIMALLY
22 INVASIVE SURGERY CENTER, an
23 unknown entity; CONEJO NEUROLOGICAL
24 MEDICAL GROUP, INC., a California
25 Corporation; LOS ANGELES
26 ORTHOPAEDIC INSTITUTE, INC., a
27 California Corporation; MEDICAL
28 IMAGING MEDICAL GROUP, an unknown
entity; MOUNTAIN VIEW SURGICAL
CENTER, INC., a California Corporation;
CHARLES K. NEAL, an individual; QUEST
DIAGNOSTICS WEST HILLS, a foreign
Delaware Corporation; SCREEN ACTORS
GUILD, INC., a California Corporation;
THOUSAND OAKS SPINE MEDICAL
GROUP, INC., a California Corporation;
STEVEN ZLATT, M.D., INC., a California
Corporation; OASIS LEGAL FINANCE,
LLC, a foreign Illinois Limited Liability
Company; MCDONALD, CARANO
WILSON LLP, a Nevada Limited Liability
Partnership; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS
COMMUNITY HOSPITAL, LTD, A
CALIFORNIA LP, a California Limited
Partnership; VALLEY OPEN MRI, LLC, a

Electronically Filed
11/10/2011 03:37:29 PM



CLERK OF THE COURT

CASE NO.: A - 11 - 651563 - C

DEPT NO.: XXVII I

COMPLAINT IN INTERPLEADER

1 California Limited Liability Company; and
2 DOES I-V, inclusive; and ROE
CORPORATIONS VI-X, inclusive,

3 Defendants.
4

5 **COMPLAINT IN INTERPLEADER**

6 COMES NOW, Plaintiff, THE BOURASSA LAW GROUP, LLC, by and through its
7 attorneys of record Mark J. Bourassa, Esq. and Christopher W. Carson, Esq., and hereby brings
8 this Complaint in Interpleader under Rule 22 of the Nevada Rules of Civil Procedure and for such
9 causes of action alleges:
10

11 1. At all times relevant hereto, Plaintiff THE BOURASSA LAW GROUP, LLC was
12 and is a Nevada Limited Liability Company duly organized and existing under the laws of the
13 State of Nevada.

14 2. Plaintiff is informed and believes and thereupon alleges that at all times relevant
15 hereto Defendant, CALIFORNIA BACK SPECIALISTS MEDICAL GROUP, INC., was and is a
16 California Corporation, duly organized and existing under the laws of the State of California.

17 3. Plaintiff is informed and believes and thereupon alleges that at all times relevant
18 hereto, Defendant, CALIFORNIA MINIMALLY INVASIVE SURGERY CENTER, was and is
19 an unknown entity, duly licensed under the laws of the State of California.
20

21 4. Plaintiff is informed and believes and thereupon alleges that at all times relevant
22 hereto, Defendant, CONEJO NEUROLOGICAL MEDICAL GROUP, INC., was and is a
23 California Corporation, duly organized and existing under the laws of the State of California.
24

25 5. Plaintiff is informed and believes and thereupon alleges that at all times relevant
26 hereto Defendant, LOS ANGELES ORTHOPAEDIC INSTITUTE, INC, was and is a California
27 Corporation, duly organized and existing under the laws of the State of California.

28 6. Plaintiff is informed and believes and thereupon alleges that at all times relevant

1 hereto Defendant, MEDICAL IMAGING MEDICAL GROUP, was and is an unknown entity,
2 duly licensed under the laws of the State of California.

3 7. Plaintiff is informed and believes and thereupon alleges that at all times relevant
4 hereto Defendant, MOUNTAIN VIEW SURGICAL CENTER, INC., was and is a California
5 Corporation, duly organized and existing under the laws of the State of California.
6

7 8. Plaintiff is informed and believes and thereupon alleges that at all times relevant
8 hereto Defendant, CHARLES K. NEAL is an individual licensed to do business under the laws of
9 the State of California.

10 9. Plaintiff is informed and believes and thereupon alleges that at all times relevant
11 hereto Defendant, QUEST DIAGNOSTICS WEST HILLS, was and is a Delaware Corporation,
12 duly organized and existing under the laws of the State of Delaware, and was and is licensed to do
13 business in the State of California.
14

15 10. Plaintiff is informed and believes and thereupon alleges that at all times relevant
16 hereto, Defendant, SCREEN ACTORS GUILD, INC., was and is a California Corporation, duly
17 organized and existing under the laws of the State of California.

18 11. Plaintiff is informed and believes and thereupon alleges that at all times relevant
19 hereto, Defendant, THOUSAND OAKS SPINE MEDICAL GROUP, INC., was and is a
20 California Corporation, duly organized and existing under the laws of the State of California.
21

22 12. Plaintiff is informed and believes and thereupon alleges that at all times relevant
23 hereto Defendant, STEVEN ZLATT, M.D., INC., was and is a California Corporation, duly
24 organized and existing under the laws of the State of California.

25 13. Plaintiff is informed and believes and thereupon alleges that at all times relevant
26 hereto Defendant, OASIS LEGAL FINANCE, LLC as and is an Illinois Limited Liability
27 Company, duly organized and existing under the laws of the State of Illinois and licensed to do
28

1 business in Clark County, Nevada.

2 14. Plaintiff is informed and believes and thereupon alleges that at all times relevant
3 hereto, Defendant, MCDONALD, CARANO WILSON LLP was and is a Nevada Limited
4 Liability Partnership, duly organized and existing under the laws of the State of Nevada and
5 doing business in Clark County, Nevada.
6

7 15. Plaintiff is informed and believes and thereupon alleges that at all times relevant
8 hereto, Defendant, IMAGING CENTER OF THE VALLEY AT SHERMAN OAKS
9 COMMUNITY HOSPITAL, LTD, A CALIFORNIA LP, was and is a California Limited
10 Partnership duly organized and existing under the laws of the State of California.

11 16. Plaintiff is informed and believes and thereupon alleges that at all times relevant
12 hereto, Defendant, VALLEY OPEN MRI, LLC, was and is a California Limited Liability
13 Company, duly organized and existing under the laws of the State of California.
14

15 17. THE BOURASSA LAW GROUP, LLC entered into a valid lawyer's contingency
16 retainer agreement with ROBERT COOPER whereby ROBERT COOPER agreed to pay Plaintiff
17 40% of any award recovered in addition to all costs associated with pursuing his claim for
18 personal injuries against ABC Union Cab Co., Union Cab Co., a/k/a ABC Union Cab Co., and
19 Tony D'Angelo.
20

21 18. THE BOURASSA LAW GROUP, LLC has recovered personal injury proceeds in
22 the amount of \$55,000 on behalf of ROBERT COOPER for his claims against ABC Union Cab
23 Co., Union Cab Co., a/k/a ABC Union Cab Co., and Tony D'Angelo.

24 19. THE BOURASSA LAW GROUP, LLC is entitled to attorney's fees in the amount
25 of 40% of the "total recovery" per the retainer contract, and is entitled to costs in the amount of
26 \$30.89.

27 20. Each of the Defendants herein is owed money and/or has an existing lien on
28

1 ROBERT COOPER's settlement for medical services and treatment provided to him from a
2 motor vehicle accident that occurred on December 10, 2005 in Clark County, Nevada.

3 21. Each of the Defendants claim some right, entitlement, interest or benefit of the
4 settlement funds based upon an existing lien.

5 22. The amount of the liens for medical treatment and services collectively, exceeds
6 the amount of the settlement funds available.

7 23. THE BOURASSA LAW GROUP, LLC cannot safely determine without hazard to
8 itself to whom the proceeds of the settlement should be paid, and how the proceeds should be
9 divided. As such, it has become necessary to file the Complaint for Interpleader.

10 24. THE BOURASSA LAW GROUP, LLC has brought this Complaint in good faith and
11 without collusion with any parties hereto. When directed by the Court, THE BOURASSA LAW
12 GROUP, LLC shall immediately deposit the sum of \$55,000 and said proceeds be held by the
13 Court, or its designee, pending the resolution of the competing claims of the parties herein.

14 25. Plaintiff is entitled to a full and final release of all medical liens in exchange for
15 individual amounts to be determined by the Court.

16 **WHEREFORE**, Plaintiff, THE BOURASSA LAW GROUP, LLC expressly reserving its
17 right to amend its Complaint at the time of the hearing of the action herein to include Defendants
18 not yet ascertained, prays as follows:

19 1. That Defendants appear and answer to establish whatever claims they have with
20 respect to the settlement proceeds;

21 2. That the Court order immediate payment to THE BOURASSA LAW GROUP,
22 LLC out of the Interpleader funds the amount of \$22,000 for attorney's fees and the sum of
23 \$30.89 for its costs based upon its valid lien and pursuant to its statutory priority;

24 3. That the Court determines which of the parties is entitled to the proceeds of the
25
26
27
28

1 award and to what extent each party shall rightfully be paid;


2 4. That the Court award reasonable attorney's fees to the undersigned counsel by
3 reason of necessity of bringing this action;

4 5. For costs incurred herein; and

5 6. For further relief as the Court may deem just and proper.

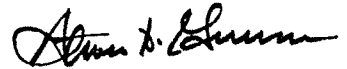
6 DATED this 10th day of November, 2011.

8 **THE BOURASSA LAW GROUP, LLC**

9 
10 MARK J. BOURASSA, ESQ.
11 Nevada Bar No. 7999
12 CHRISTOPHER W. CARSON, ESQ.
13 Nevada Bar No. 9523
14 3025 W. Sahara Ave., Suite 105
15 Las Vegas, Nevada 89102
16 Telephone: (702) 851-2180
17 Facsimile: (702) 851-2189

18 *Attorneys for Plaintiff*

Exhibit B-1



CLERK OF THE COURT

1 ANSC
2 GEORGE F. OGILVIE III, ESQ.
3 Nevada Bar No. 3552
4 PATRICK J. MURCH, ESQ.
5 Nevada Bar No. 10162
6 McDONALD CARANO WILSON LLP
7 2300 West Sahara Avenue, Suite 1000
8 Las Vegas, Nevada 89102
9 gogilvie@mcdonaldcarano.com
10 pmurch@mcdonaldcarano.com
11 Telephone: (702) 873-4100
12 Facsimile: (702) 873-9966

13 *Attorneys for McDonald Carano Wilson LLP*

9 **DISTRICT COURT**
10 **CLARK COUNTY, NEVADA**

11 THE BOURASSA LAW GROUP, LLC

12 Plaintiff,

13 vs.

14 CALIFORNIA BACK SPECIALISTS MEDICAL
15 GROUP, INC., a California corporation;
16 CALIFORNIA MINIMALLY INVASIVE
17 SURGERY CENTER, an unknown entity;
18 CONEJO NEUROLOGICAL MEDICAL
19 GROUP, INC., a California corporation; LOS
20 ANGELES ORTHOPAEDIC INSTITUTE, INC.,
21 a California corporation; MEDICAL IMAGING
22 MEDICAL GROUP, an unknown entity;
23 MOUNTAIN VIEW SURGICAL CENTER, INC.,
24 a California corporation; CHARLES K. NEAL, an
25 individual; QUEST DIAGNOSTICS WEST
26 HILLS, a foreign Delaware corporation; SCREEN
27 ACTORS GUILD, INC., a California corporation;
28 THOUSAND OAKS SPINE MEDICAL GROUP,
INC., a California corporation; STEVEN ZLATT,
M.D., INC., a California corporation; OASIS
LEGAL FINANCE, LLC, a foreign Illinois limited
liability company; McDONALD CARANO
WILSON LLP, a Nevada limited liability
partnership; IMAGING CENER OF THE
VALLEY AT SHERMAN OAKS COMMUNITY
HOSPITAL, LTD., A CALIFORNIA LP, a
California limited partnership; VALLEY OPEN
MRI, LLC, a California limited liability company;
and DOES I-V, inclusive; and ROE
CORPORATIONS VI-X, inclusive,

Defendants.

Case No.: A651563
Dept. No.: XXVIII

**McDONALD CARANO WILSON LLP'S
ANSWER TO COMPLAINT IN
INTERPLEADER, COUNTERCLAIM,
AND CROSS-CLAIM**

McDONALD CARANO WILSON LLP, a Nevada
limited liability partnership,

Counterclaimant,

vs.

THE BOURASSA LAW GROUP, LLC, a Nevada
limited liability company; and DOES I-V,
inclusive; and ROE CORPORATIONS VI-X,
inclusive,

Counterdefendants.

McDONALD CARANO WILSON LLP, a Nevada
limited liability partnership,

Cross-Claimant,

vs.

CALIFORNIA BACK SPECIALISTS MEDICAL
GROUP, INC., a California corporation;
CALIFORNIA MINIMALLY INVASIVE
SURGERY CENTER, an unknown entity;
CONEJO NEUROLOGICAL MEDICAL
GROUP, INC., a California corporation; LOS
ANGELES ORTHOPAEDIC INSTITUTE, INC.,
a California corporation; MEDICAL IMAGING
MEDICAL GROUP, an unknown entity;
MOUNTAIN VIEW SURGICAL CENTER, INC.,
a California corporation; CHARLES K. NEAL, an
individual; QUEST DIAGNOSTICS WEST
HILLS, a foreign Delaware corporation; SCREEN
ACTORS GUILD, INC., a California corporation;
THOUSAND OAKS SPINE MEDICAL GROUP,
INC., a California corporation; STEVEN ZLATT,
M.D., INC., a California corporation; OASIS
LEGAL FINANCE, LLC, a foreign Illinois limited
liability company; IMAGING CENER OF THE
VALLEY AT SHERMAN OAKS COMMUNITY
HOSPITAL, LTD., A CALIFORNIA LP, a
California limited partnership; VALLEY OPEN
MRI, LLC, a California limited liability company;
and DOES I-V, inclusive; and ROE
CORPORATIONS VI-X, inclusive,

Cross-Claim Defendants.

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

1. Answering paragraphs 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 15, 16, 17, 18, 22, 23, 24 and 25 of the Complaint, McDonald Carano lacks sufficient knowledge or information to form a belief as to the truth of the allegations set forth therein and, on that basis, denies each and every allegation set forth in said paragraphs.

3. Answering paragraph 19 of the Complaint, McDonald Carano denies each and every allegation set forth therein.

5. Except as specifically admitted or explained above, McDonald Carano denies each and every remaining allegation in the Complaint.

Because this case is in its infancy, MCW has not yet discovered all relevant facts. Additional facts may support the assertion of additional affirmative defenses, including, but not limited to, those enumerated in Rule 8(c) of the Nevada Rules of Civil Procedure. MCW reserves the right to assert such affirmative defenses as discovery proceeds.

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18

6
7
8
9
10
11
12
13
14
15
16
17
18

9
10
11
12
13
14
15
16
17
18

20
21
22
23
24
25
26
27
28

26
27
28

1 (including several depositions in California), engaging in motion practice, corresponding with
2 medical providers and other potential witnesses, and preparing for and participating in a
3 settlement conference.

4 7. In connection with its representation of Cooper relative to the Litigation,
5 McDonald Carano incurred in excess of \$50,000.00 in attorneys' fees. In addition, McDonald
6 Carano incurred Litigation-related costs in excess of \$13,000.00. McDonald Carano has not been
7 paid any amount of such attorneys' fees and/or costs.

8 8. On or about October 8, 2010, McDonald Carano filed a motion to withdraw from
9 representing Cooper in connection with the Litigation, which motion was granted following a
10 hearing on October 19, 2010.

11 9. On or about October 20, 2010, McDonald Carano caused a lien to be recorded in
12 the Office of the Recorder of Clark County, Nevada, as Book/Instrument No. 0220004202 (the
13 Lien), pursuant to which, among other things, McDonald Carano asserted a lien against any
14 recovery obtained by Cooper in connection with the Litigation.

15 10. On information and belief, following McDonald Carano's withdrawal from its
16 representation of Cooper, Cooper retained the Bourassa Firm to represent him in connection with
17 the Litigation.

18 11. On information and belief, the Bourassa Firm performed limited work and
19 incurred minimal costs in connection with its representation of Cooper.

20 12. On information and belief, in May or June of 2011, Cooper and Union Cab agreed
21 to settle the Litigation for \$55,000.00 (the "Settlement Proceeds"). Thereafter, Union Cab issued
22 a check to the Bourassa Firm, which is currently seeking to interplead the Settlement Proceeds in
23 the above-captioned matter.

24 13. But for the work performed, and costs incurred, by McDonald Carano, the
25 Bourassa Firm would not have recovered the Settlement Proceeds.

26 14. McDonald Carano has a valid and existing claim against the Settlement Proceeds
27 in the approximate amount of \$35,000.00, excluding interest.
28

15. The Settlement Proceeds are insufficient to satisfy the claims of McDonald and the Bourassa Firm.

16. McDonald Carano's Lien has priority and McDonald Carano is entitled to recover the approximately \$35,000.00 in fees and costs to which it is entitled before the Bourassa Firm is entitled to recover fees.

WHEREFORE, McDonald Carano prays for orders and/or judgments as follows:

1. Directing the Bourassa Firm to deposit the entire amount of the Settlement Proceeds with the Clerk of the Court;

2. Directing the deposit of such sums as are deposited with the Court in an interest-bearing account;

3. Determining that the Lien is valid;

4. Determining that McDonald Carano's claim against the Settlement Proceeds has priority;

5. Awarding McDonald Carano the amount of its claim against the Settlement Proceeds;

6. Denying relief to any other party inconsistent with the foregoing; and

7. For such other and further relief as the Court deems just and proper.

CROSS-CLAIM

Defendant in interpleader/cross-claimant McDonald Carano Wilson LLP (“McDonald Carano”), as and for its cross-claim against defendants/cross-claim defendants California Back Specialists Medical Group, Inc., California Minimally Invasive Surgery Center, Conejo Neurological Medical Group, Inc., Los Angeles Orthopaedic Institute, Inc., Medical Imaging Medical Group, Mountain View Surgical Center, Inc., Charles K. Neal, Quest Diagnostics West Hills, Screen Actors Guild, Inc., Thousand Oaks Spine Medical Group, Inc., Steven Zlatt, M.D., Inc., Oasis Legal Finance, LLC, Imaging Center of the Valley at Sherman Oaks Community

1 Hospital, Ltd., a California LP, and Valley Open MRI, LLC (collectively, the Cross-Claim
2 Defendants), complains and alleges as follows:

3 **PARTIES, JURISDICTION, AND VENUE**

4 1. McDonald Carano is a Nevada limited liability partnership that is authorized to
5 conduct business in, and, at all times relevant to this counterclaim, conducting business in, the
6 State of Nevada.

7 2. On information and belief, California Back Specialists Medical Group, Inc. is a
8 California corporation.

9 3. On information and belief, California Minimally Invasive Surgery Center is an
10 entity of unknown form and/or origin with its principal place of business in California.

11 4. On information and belief, Conejo Neurological Medical Group, Inc. is a
12 California corporation.

13 5. On information and belief, Los Angeles Orthopaedic Institute, Inc. is a California
14 corporation.

15 6. On information and belief, Medical Imaging Medical Group is an entity of
16 unknown form and/or origin with its principal place of business in California.

17 7. On information and belief, Charles K. Neal is a California resident.

18 8. On information and belief, Quest Diagnostics West Hills is a Delaware
19 corporation.

20 9. On information and belief, Screen Actors Guild, Inc. is a California corporation.

21 10. On information and belief, Thousand Oaks Spine Medical Group, Inc. is a
22 California corporation.

23 11. On information and belief, Steven Zlatt, M.D., Inc. is a California corporation.

24 12. On information and belief, Oasis Legal Finance, LLC is an Illinois limited liability
25 company.

26 13. On information and belief, Imaging Center of the Valley at Sherman Oaks
27 Community Hospital, Ltd., a California LP, is a California limited liability partnership.
28

1 14. On information and belief, Valley open MRI, LLC is a California limited liability
2 company.

3 15. The true names and capacities, whether individual, corporate, associate, or
4 otherwise, of counterclaim defendants designated as DOE and ROE defendants, are unknown to
5 McDonald Carano, which sues such cross-claim defendants by fictitious names. McDonald
6 Carano will seek leave of this Court to amend its cross-claim to substitute the proper parties when
7 the same have been ascertained.

8 16. This Court has jurisdiction over this matter, and venue is proper in this Court,
9 because the underlying litigation upon which this matter is based, and from which the settlement
10 proceeds at issue were obtained, occurred in Clark County, Nevada.

11 **GENERAL ALLEGATIONS**

12 17. Each and all of the allegations set forth in the foregoing counterclaim (styled as
13 McDonald Carano Wilson LLP v. The Bourassa Law Group, LLC) are incorporated herein by
14 this reference as though set forth in full and at length.

15 18. On information and belief, with the exception of Oasis Legal Finance, LLC, all of
16 the Cross-Claim Defendants provided medical services and/or incurred costs in connection with
17 the treatment of Robert K. Cooper following the traffic accident upon which the Litigation is
18 based.

19 19. On information and belief, pursuant to a written agreement with Cooper, Oasis
20 Legal Finance, LLC advanced litigation funds and/or purchased an interest in any funds
21 recovered by Cooper in connection with the Litigation.

22 20. On information and belief, each of the Cross-Claim Defendants has an actual or
23 potential claim to, is owed money from, and/or has an actual or potential lien on, the Settlement
24 Proceeds.

25 21. On information and belief, the amount of the Settlement Proceeds is insufficient to
26 satisfy the claims of McDonald Carano and the Cross-Claim Defendants.

22. McDonald Carano's Lien has priority and McDonald Carano is entitled to recover the approximately \$35,000.00 in fees and costs to which it is entitled before the Bourassa Firm is entitled to recover fees.

WHEREFORE, McDonald Carano prays for orders and/or judgments as follows:

1. Directing the Bourassa Firm to deposit the entire amount of the Settlement Proceeds with the Clerk of the Court;

2. Directing the deposit of such sums as are deposited with the Court in an interest-bearing account;

3. Determining that the Lien is valid;

4. Determining that McDonald Carano's claim against the Settlement Proceeds has priority;

5. Awarding McDonald Carano the amount of its claim against the Settlement Proceeds;

6. Denying relief to any claimant that does not affirmatively assert its rights to the Settlement Proceeds;

7. Denying relief to any other party inconsistent with the foregoing; and

8. For such other and further relief as the Court deems just and proper.

DATED this 20th day of December, 2011.

McDONALD CARANO WILSON LLP

By: /s/ George F. Ogilvie III

George F. Ogilvie III, Esq. (#3552)
Patrick J. Murch, Esq. (#10162)
2300 West Sahara Avenue, Suite 1000
Las Vegas, Nevada 89102
gogilvie@mcdonaldcarano.com
pmurch@mcdonaldcarano.com

Attorneys for McDonald Carano Wilson LLP

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

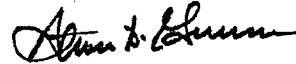
I hereby certify that I am an employee of the law firm of McDonald Carano Wilson LLP and, on December 20, 2011, I caused a copy of the foregoing **ANSWER TO COMPLAINT IN INTERPLEADER, COUNTERCLAIM, AND CROSS-CLAIM** to be served, via United States Mail, upon the following:

Mark J. Bourassa, Esq.
Christopher W. Carson, Esq.
The Bourassa Law Group, LLC
3025 West Sahara Avenue, Suite 105
Las Vegas, Nevada 89102

By: /s/ Kathy Barrett
An Employee of McDonald Carano Wilson LLP

238905

Exhibit C



CLERK OF THE COURT

1 **JUDG**

2 MARK J. BOURASSA, ESQ.

3 Nevada Bar No. 7999

4 CHRISTOPHER W. CARSON, ESQ.

5 Nevada Bar No. 9523

6 **THE BOURASSA LAW GROUP, LLC**

7 8668 Spring Mountain Road, Suite 101

8 Las Vegas, Nevada 89117

9 Telephone: (702) 851-2180

10 Facsimile: (702) 851-2189

11 mbourassa@bourassalawgroup.com

12 ccarson@bourassalawgroup.com

13 *Attorneys for Plaintiff*

9 **DISTRICT COURT**

10 **CLARK COUNTY, NEVADA**

11 THE BOURASSA LAW GROUP, LLC

12 Plaintiff,

13 vs.

14 CALIFORNIA BACK SPECIALISTS MEDICAL
15 GROUP, INC., a California corporation;
16 CALIFORNIA MINIMALLY INVASIVE
17 SURGERY CENTER, an unknown entity;
18 CONEJO NEUROLOGICAL MEDICAL
19 GROUP, INC., a California corporation; LOS
20 ANGELES ORTHOPAEDIC INSTITUTE, INC.,
21 a California corporation; MEDICAL IMAGING
22 MEDICAL GROUP, an unknown entity;
23 MOUNTAIN VIEW SURGICAL CENTER, INC.,
24 a California corporation; CHARLES K. NEAL, an
25 individual; QUEST DIAGNOSTICS WEST
26 HILLS, a foreign Delaware corporation; SCREEN
27 ACTORS GUILD, INC., a California corporation;
28 THOUSAND OAKS SPINE MEDICAL GROUP,
INC., a California corporation; STEVEN ZLATT,
M.D., INC., a California corporation; OASIS
LEGAL FINANCE, LLC, a foreign Illinois limited
liability company; McDONALD CARANO
WILSON LLP, a Nevada limited liability
partnership; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS COMMUNITY
HOSPITAL, LTD., A CALIFORNIA LP, a
California limited partnership; VALLEY OPEN
MRI, LLC, a California limited liability company;
and DOES I-V, inclusive; and ROE
CORPORATIONS VI-X, inclusive,

Defendants.

Case No.: A651563

Dept. No.: XXVIII

**DEFAULT JUDGMENT AS TO
DEFENDANT
LOS ANGELES ORTHOPAEDIC
INSTITUTE, INC.**

8/10/12 (28)

1 McDONALD CARANO WILSON LLP, a
2 Nevada limited liability partnership,

3 Counterclaimant,

4 vs.

5 THE BOURASSA LAW GROUP, LLC, a Nevada
6 limited liability company; and DOES I-V,
7 inclusive; and ROE CORPORATIONS VI-X,
8 inclusive,

8 Counterclaim Defendants.

9 McDONALD CARANO WILSON LLP, a
10 Nevada limited liability partnership,

11 Cross-Claimant,

12 vs.

13 CALIFORNIA BACK SPECIALISTS MEDICAL
14 GROUP, INC., a California corporation;
15 CALIFORNIA MINIMALLY INVASIVE
16 SURGERY CENTER, an unknown entity;
17 CONEJO NEUROLOGICAL MEDICAL
18 GROUP, INC., a California corporation; LOS
19 ANGELES ORTHOPAEDIC INSTITUTE, INC.,
20 a California corporation; MEDICAL IMAGING
21 MEDICAL GROUP, an unknown entity;
22 MOUNTAIN VIEW SURGICAL CENTER, INC.,
23 a California corporation; CHARLES K. NEAL, an
24 individual; QUEST DIAGNOSTICS WEST
25 HILLS, a foreign Delaware corporation; SCREEN
26 ACTORS GUILD, INC., a California corporation;
27 THOUSAND OAKS SPINE MEDICAL GROUP,
28 INC., a California corporation; STEVEN ZLATT,
M.D., INC., a California corporation; OASIS
LEGAL FINANCE, LLC, a foreign Illinois limited
liability company; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS COMMUNITY
HOSPITAL, LTD., A CALIFORNIA LP, a
California limited partnership; VALLEY OPEN
MRI, LLC, a California limited liability company;
and DOES I-V, inclusive; and ROE
CORPORATIONS VI-X, inclusive,

Cross-Claim Defendants.

1 **DEFAULT JUDGMENT AS TO DEFENDANT**
2 **LOS ANGELES ORTHOPAEDIC INSTITUTE, INC.**

3 This matter came before the Court pursuant to the Application for Entry of Judgment by
4 Default as against Defendant LOS ANGELES ORTHOPAEDIC INSTITUTE, INC on file herein
5 by Plaintiff, THE BOURASSA LAW GROUP, LLC.

6 Defendant, LOS ANGELES ORTHOPAEDIC INSTITUTE, INC., having been duly
7 served with Summons and Complaint in this action and having failed to timely answer or
8 otherwise respond to the same or enter any appearance in this action, Default having been duly
9 entered against said Defendant by the Court Clerk, and good cause appearing therefore, it is
10 hereby:

11 Accordingly, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that:

12 1. The Application for Entry of Default Judgment against the LOS ANGELES
13 ORTHOPAEDIC INSTITUTE is hereby GRANTED;

14 2. Judgment is entered in favor of the Plaintiff and against the Defaulting Party on
15 each of the Plaintiff's respective claims against the Defaulting Party;

16 3. Any interest that the Defaulting Party has or may have in or to any amount of the
17 Settlement Proceeds is foreclosed.

18 DATED this 30 day of Aug 2012.

19 
20 DISTRICT COURT JUDGE

21 Submitted by:

22 **THE BOURASSA LAW GROUP, LLC**

23 
24 MARK J. BOURASSA, ESQ.

25 Nevada Bar No. 7999

26 TRENT L. RICHARDS, ESQ.

27 Nevada Bar No. 11448

28 8668 Spring Mountain Road, Suite 101

Las Vegas, Nevada 89117

Telephone: (702) 851-2180

Facsimile: (702) 851-2189

Attorneys for Plaintiff

Exhibit C-1

1 **JUDGE**

2 MARK J. BOURASSA, ESQ.

3 Nevada Bar No. 7999

4 CHRISTOPHER W. CARSON, ESQ.

5 Nevada Bar No. 9523

6 **THE BOURASSA LAW GROUP, LLC**

7 8668 Spring Mountain Road, Suite 101

8 Las Vegas, Nevada 89117

9 Telephone: (702) 851-2180

10 Facsimile: (702) 851-2189

11 mbourassa@bourassalawgroup.com

12 ccarson@bourassalawgroup.com

13 *Attorneys for Plaintiff*

14 **DISTRICT COURT**

15 **CLARK COUNTY, NEVADA**

16 THE BOURASSA LAW GROUP, LLC

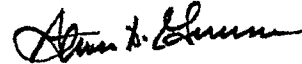
17 Plaintiff,

18 vs.

19 CALIFORNIA BACK SPECIALISTS MEDICAL
20 GROUP, INC., a California corporation;
21 CALIFORNIA MINIMALLY INVASIVE
22 SURGERY CENTER, an unknown entity;
23 CONEJO NEUROLOGICAL MEDICAL
24 GROUP, INC., a California corporation; LOS
25 ANGELES ORTHOPAEDIC INSTITUTE, INC.,
26 a California corporation; MEDICAL IMAGING
27 MEDICAL GROUP, an unknown entity;
28 MOUNTAIN VIEW SURGICAL CENTER, INC.,
a California corporation; CHARLES K. NEAL, an
individual; QUEST DIAGNOSTICS WEST
HILLS, a foreign Delaware corporation; SCREEN
ACTORS GUILD, INC., a California corporation;
THOUSAND OAKS SPINE MEDICAL GROUP,
INC., a California corporation; STEVEN ZLATT,
M.D., INC., a California corporation; OASIS
LEGAL FINANCE, LLC, a foreign Illinois limited
liability company; McDONALD CARANO
WILSON LLP, a Nevada limited liability
partnership; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS COMMUNITY
HOSPITAL, LTD., A CALIFORNIA LP, a
California limited partnership; VALLEY OPEN
MRI, LLC, a California limited liability company;
and DOES I-V, inclusive; and ROE
CORPORATIONS VI-X, inclusive,

Defendants.

Electronically Filed
09/05/2012 04:03:29 PM



CLERK OF THE COURT

Case No.: A651563

Dept. No.: XXVIII

**DEFAULT JUDGMENT AS TO
DEFENDANT
IMAGING CENTER OF THE VALLEY
AT SHERMAN OAKS COMMUNITY
HOSPITAL, LTD.**



1 McDONALD CARANO WILSON LLP, a
2 Nevada limited liability partnership,

3 Counterclaimant,

4 vs.

5 THE BOURASSA LAW GROUP, LLC, a Nevada
6 limited liability company; and DOES I-V,
7 inclusive; and ROE CORPORATIONS VI-X,
8 inclusive,

8 Counterclaim Defendants.

9 McDONALD CARANO WILSON LLP, a
10 Nevada limited liability partnership,

11 Cross-Claimant,

12 vs.

13 CALIFORNIA BACK SPECIALISTS MEDICAL
14 GROUP, INC., a California corporation;
15 CALIFORNIA MINIMALLY INVASIVE
16 SURGERY CENTER, an unknown entity;
17 CONEJO NEUROLOGICAL MEDICAL
18 GROUP, INC., a California corporation; LOS
19 ANGELES ORTHOPAEDIC INSTITUTE, INC.,
20 a California corporation; MEDICAL IMAGING
21 MEDICAL GROUP, an unknown entity;
22 MOUNTAIN VIEW SURGICAL CENTER, INC.,
23 a California corporation; CHARLES K. NEAL, an
24 individual; QUEST DIAGNOSTICS WEST
25 HILLS, a foreign Delaware corporation; SCREEN
26 ACTORS GUILD, INC., a California corporation;
27 THOUSAND OAKS SPINE MEDICAL GROUP,
28 INC., a California corporation; STEVEN ZLATT,
M.D., INC., a California corporation; OASIS
LEGAL FINANCE, LLC, a foreign Illinois limited
liability company; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS COMMUNITY
HOSPITAL, LTD., A CALIFORNIA LP, a
California limited partnership; VALLEY OPEN
MRI, LLC, a California limited liability company;
and DOES I-V, inclusive; and ROE
CORPORATIONS VI-X, inclusive,

Cross-Claim Defendants.

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

3
4
5

7
8
9
10

12

13

15

17

10

31

22

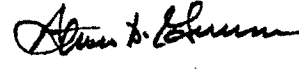
23

23

25
26
27
28

44

Exhibit C-2


CLERK OF THE COURT

JUDG
MARK J. BOURASSA, ESQ.
Nevada Bar No. 7999
CHRISTOPHER W. CARSON, ESQ.
Nevada Bar No. 9523
THE BOURASSA LAW GROUP, LLC
8668 Spring Mountain Road, Suite 101
Las Vegas, Nevada 89117
Telephone: (702) 851-2180
Facsimile: (702) 851-2189
mbourassa@bourassalawgroup.com
ccarson@bourassalawgroup.com

Attorneys for Plaintiff

DISTRICT COURT

CLARK COUNTY, NEVADA

THE BOURASSA LAW GROUP, LLC

Plaintiff,

vs.

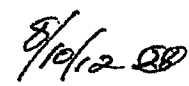
CALIFORNIA BACK SPECIALISTS MEDICAL
GROUP, INC., a California corporation;
CALIFORNIA MINIMALLY INVASIVE
SURGERY CENTER, an unknown entity;
CONEJO NEUROLOGICAL MEDICAL
GROUP, INC., a California corporation; LOS
ANGELES ORTHOPAEDIC INSTITUTE, INC.,
a California corporation; MEDICAL IMAGING
MEDICAL GROUP, an unknown entity;
MOUNTAIN VIEW SURGICAL CENTER, INC.,
a California corporation; CHARLES K. NEAL, an
individual; QUEST DIAGNOSTICS WEST
HILLS, a foreign Delaware corporation; SCREEN
ACTORS GUILD, INC., a California corporation;
THOUSAND OAKS SPINE MEDICAL GROUP,
INC., a California corporation; STEVEN ZLATT,
M.D., INC., a California corporation; OASIS
LEGAL FINANCE, LLC, a foreign Illinois limited
liability company; McDONALD CARANO
WILSON LLP, a Nevada limited liability
partnership; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS COMMUNITY
HOSPITAL, LTD., A CALIFORNIA LP, a
California limited partnership; VALLEY OPEN
MRI, LLC, a California limited liability company;
and DOES I-V, inclusive; and ROE
CORPORATIONS VI-X, inclusive,

Defendants.

Case No.: A651563

Dept. No.: XXVIII

**DEFAULT JUDGMENT AS TO
DEFENDANT
STEVEN ZLATT, M.D., INC.**

8/10/12 

1 McDONALD CARANO WILSON LLP, a
2 Nevada limited liability partnership,

3 Counterclaimant,

4 vs.

5 THE BOURASSA LAW GROUP, LLC, a Nevada
6 limited liability company; and DOES I-V,
7 inclusive; and ROE CORPORATIONS VI-X,
8 inclusive,

8 Counterclaim Defendants.

9 McDONALD CARANO WILSON LLP, a
10 Nevada limited liability partnership,

11 Cross-Claimant,

12 vs.

13 CALIFORNIA BACK SPECIALISTS MEDICAL
14 GROUP, INC., a California corporation;
15 CALIFORNIA MINIMALLY INVASIVE
16 SURGERY CENTER, an unknown entity;
17 CONEJO NEUROLOGICAL MEDICAL
18 GROUP, INC., a California corporation; LOS
19 ANGELES ORTHOPAEDIC INSTITUTE, INC.,
20 a California corporation; MEDICAL IMAGING
21 MEDICAL GROUP, an unknown entity;
22 MOUNTAIN VIEW SURGICAL CENTER, INC.,
23 a California corporation; CHARLES K. NEAL, an
24 individual; QUEST DIAGNOSTICS WEST
25 HILLS, a foreign Delaware corporation; SCREEN
26 ACTORS GUILD, INC., a California corporation;
27 THOUSAND OAKS SPINE MEDICAL GROUP,
28 INC., a California corporation; STEVEN ZLATT,
M.D., INC., a California corporation; OASIS
LEGAL FINANCE, LLC, a foreign Illinois limited
liability company; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS COMMUNITY
HOSPITAL, LTD., A CALIFORNIA LP, a
California limited partnership; VALLEY OPEN
MRI, LLC, a California limited liability company;
and DOES I-V, inclusive; and ROE
CORPORATIONS VI-X, inclusive,

Cross-Claim Defendants.

DEFAULT JUDGMENT AS TO DEFENDANT
STEVEN ZLATT, M.D., INC.

This matter came before the Court pursuant to the Application for Entry of Judgment by Default as against Defendant LOS ANGELES ORTHOPAEDIC INSTITUTE, INC on file herein by Plaintiff, THE BOURASSA LAW GROUP, LLC.

Defendant, LOS ANGELES ORTHOPAEDIC INSTITUTE, INC., having been duly served with Summons and Complaint in this action and having failed to timely answer or otherwise respond to the same or enter any appearance in this action, Default having been duly entered against said Defendant by the Court Clerk, and good cause appearing therefore, it is hereby:

Accordingly, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that:

1. The Application for Entry of Default Judgment against the LOS ANGELES ORTHOPAEDIC INSTITUTE is hereby GRANTED;

2. Judgment is entered in favor of the Plaintiff and against the Defaulting Party on each of the Plaintiff's respective claims against the Defaulting Party;

3. Any interest that the Defaulting Party has or may have in or to any amount of the Settlement Proceeds is foreclosed.

DATED this 4 day of Sept 2012


DISTRICT COURT JUDGE

Submitted by:


THE BOURASSA LAW GROUP, LLC

MARK J. BOURASSA, ESQ.

Nevada Bar No. 7999

TRENT L. RICHARDS, ESQ.

Nevada Bar No. 11448

8668 Spring Mountain Road, Suite 101

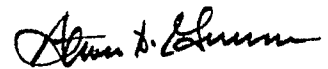
Las Vegas, Nevada 89117

Telephone: (702) 851-2180

Facsimile: (702) 851-2189

Attorneys for Plaintiff

Exhibit C-3



CLERK OF THE COURT

1 **DFJD**
2 GEORGE F. OGILVIE III, ESQ.
3 Nevada Bar No. 3552
4 PATRICK J. MURCH, ESQ.
5 Nevada Bar No. 10162
6 RORY T. KAY, ESQ.
7 Nevada Bar No. 12416
8 McDONALD CARANO WILSON LLP
9 2300 West Sahara Avenue, Suite 1000
10 Las Vegas, Nevada 89102
11 (702) 873-4100
12 *Attorneys for McDonald Carano Wilson LLP*

9 **DISTRICT COURT**
10 **CLARK COUNTY, NEVADA**

11 **THE BOURASSA LAW GROUP, LLC**
12 **Plaintiff,**

13 **vs.**

14 **CALIFORNIA BACK SPECIALISTS MEDICAL**
15 **GROUP, INC., a California corporation;**
16 **CALIFORNIA MINIMALLY INVASIVE**
17 **SURGERY CENTER, an unknown entity;**
18 **CONEJO NEUROLOGICAL MEDICAL**
19 **GROUP, INC., a California corporation; LOS**
20 **ANGELES ORTHOPAEDIC INSTITUTE, INC.,**
21 **a California corporation; MEDICAL IMAGING**
22 **MEDICAL GROUP, an unknown entity;**
23 **MOUNTAIN VIEW SURGICAL CENTER, INC.,**
24 **a California corporation; CHARLES K. NEAL, an**
25 **individual; QUEST DIAGNOSTICS WEST**
26 **HILLS, a foreign Delaware corporation; SCREEN**
27 **ACTORS GUILD, INC., a California corporation;**
28 **THOUSAND OAKS SPINE MEDICAL GROUP,**
INC., a California corporation; STEVEN ZLATT,
M.D., INC., a California corporation; OASIS
LEGAL FINANCE, LLC, a foreign Illinois limited
liability company; McDONALD CARANO
WILSON LLP, a Nevada limited liability
partnership; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS COMMUNITY
HOSPITAL, LTD., A CALIFORNIA LP, a
California limited partnership; VALLEY OPEN
MRI, LLC, a California limited liability company;
and DOES I-V, inclusive; and ROE
CORPORATIONS VI-X, inclusive,

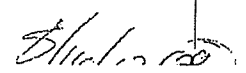
Defendants.

Case No.: A651563
Dept. No.: XXVIII

DEFAULT JUDGMENT AGAINST

- 1) **LOS ANGELES ORTHOPAEDIC, INC.;**
2) **IMAGING CENTER OF THE VALLEY AT SHERMAN OAKS HOSPITAL, LTD., A CALIFORNIA LP;**
and
3) **STEVEN ZLATT, M.D., INC**

McDONALD CARANO WILSON
2300 WEST SAHARA AVENUE - SUITE 1000 - LAS VEGAS, NEVADA 89102-4354
PHONE (702) 873-4100 - FAX (702) 873-5966



1 McDONALD CARANO WILSON LLP, a
2 Nevada limited liability partnership,

3 Counterclaimant,

4 vs.

5 THE BOURASSA LAW GROUP, LLC, a Nevada
6 limited liability company; and DOES I-V,
7 inclusive; and ROE CORPORATIONS VI-X,
8 inclusive,

8 Counterclaim Defendants.

9 McDONALD CARANO WILSON LLP, a
10 Nevada limited liability partnership,

11 Cross-Claimant,

12 vs.

13 CALIFORNIA BACK SPECIALISTS MEDICAL
14 GROUP, INC., a California corporation;
15 CALIFORNIA MINIMALLY INVASIVE
16 SURGERY CENTER, an unknown entity;
17 CONEJO NEUROLOGICAL MEDICAL
18 GROUP, INC., a California corporation; LOS
19 ANGELES ORTHOPAEDIC INSTITUTE, INC.,
20 a California corporation; MEDICAL IMAGING
21 MEDICAL GROUP, an unknown entity;
22 MOUNTAIN VIEW SURGICAL CENTER, INC.,
23 a California corporation; CHARLES K. NEAL, an
24 individual; QUEST DIAGNOSTICS WEST
25 HILLS, a foreign Delaware corporation; SCREEN
26 ACTORS GUILD, INC., a California corporation;
27 THOUSAND OAKS SPINE MEDICAL GROUP,
28 INC., a California corporation; STEVEN ZLATT,
M.D., INC., a California corporation; OASIS
LEGAL FINANCE, LLC, a foreign Illinois limited
liability company; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS COMMUNITY
HOSPITAL, LTD., A CALIFORNIA LP, a
California limited partnership; VALLEY OPEN
MRI, LLC, a California limited liability company;
and DOES I-V, inclusive; and ROE
CORPORATIONS VI-X, inclusive,

Cross-Claim Defendants.

1 This matter came before the Court on the Application for Entry of Default Judgment
2 Against Los Angeles Orthopaedic, Inc. ("LA Orthopaedic"), Steven Zlatt, M.D., Inc. ("Dr.
3 Zlatt"), and Imaging Center of the Valley at Sherman Oaks Community Hospital, Ltd., a
4 California LP ("Imaging Center") (collectively, the "Defaulting Parties") filed by
5 defendant/counterclaimant/cross-claimant McDonald Carano Wilson LLP ("McDonald Carano").

6 The Court, having reviewed the Application and the entire case file, finds as follows:

7 1. Each of the Defaulting Parties was served with McDonald Carano's Cross-Claim,
8 and the respective summons related thereto, in accordance with the Nevada Rules of Civil
9 Procedure;

10 2. None of the Defaulting Parties answered or otherwise responded to the Cross-
11 Claim;

12 3. The Clerk of the Court has entered the default of all of the Defaulting Parties;

13 4. None of the Defaulting Parties is an infant; nor are any of the Defaulting Parties in
14 military service.

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

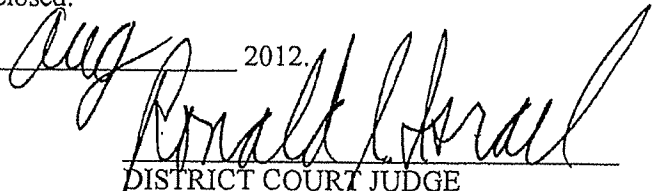
1 Accordingly, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that:

2 1. The Application for Entry of Default Judgment against the Defaulting Parties is
3 hereby GRANTED;

4 2. Judgment is entered in favor of the McDonald Carano and against the Defaulting
5 Parties on each of McDonald Carano's respective claims against the Defaulting Parties;

6 3. Any interest that any of the Defaulting Parties has or may have in or to any amount
7 of the Settlement Proceeds is foreclosed.

8 DATED this 30 day of Aug 2012.

9
10 
DISTRICT COURT JUDGE

11 RONALD J. ISRAEL *XX* *OV*
12
13
14
15

16 Submitted by:

17 McDONALD CARANO WILSON LLP

18 By: /s/ Patrick J. Murch

19 Patrick J. Murch, Esq. (#10162)

20 Rory T. Kay, Esq. (#12416)

21 2300 West Sahara Avenue, Suite 1000

22 Las Vegas, Nevada 89102

23 Attorneys for McDonald Carano Wilson LLP
24
25
26
27
28

Exhibit C-4

1 **VDSM**

2 MARK J. BOURASSA, ESQ.

3 Nevada Bar No. 7999

4 CHRISTOPHER W. CARSON, ESQ.

5 Nevada Bar No. 9523

6 **THE BOURASSA LAW GROUP, LLC**

7 8668 Spring Mountain Road, Suite 101

8 Las Vegas, Nevada 89117

9 Telephone: (702) 851-2180

10 Facsimile: (702) 851-2189

11 mbourassa@bourassalawgroup.com

12 ccarson@bourassalawgroup.com

13 *Attorneys for Plaintiff*

14 **DISTRICT COURT**

15 **CLARK COUNTY, NEVADA**

16 THE BOURASSA LAW GROUP, LLC,

17 Plaintiff,

18 vs.

CASE NO.: A651563

DEPT NO.: XXVIII

19 CALIFORNIA BACK SPECIALISTS
20 MEDICAL GROUP, INC., a California
21 Corporation; CALIFORNIA MINIMALLY
22 INVASIVE SURGERY CENTER, an
23 unknown entity; CONEJO NEUROLOGICAL
24 MEDICAL GROUP, INC., a California
25 Corporation; LOS ANGELES
26 ORTHOPAEDIC INSTITUTE, INC., a
27 California Corporation; MEDICAL
28 IMAGING MEDICAL GROUP, an unknown
entity; MOUNTAIN VIEW SURGICAL
CENTER, INC., a California Corporation;
CHARLES K. NEAL, an individual; QUEST
DIAGNOSTICS WEST HILLS, a foreign
Delaware Corporation; SCREEN ACTORS
GUILD, INC., a California Corporation;
THOUSAND OAKS SPINE MEDICAL
GROUP, INC., a California Corporation;
STEVEN ZLATT, M.D., INC., a California
Corporation; OASIS LEGAL FINANCE,
LLC, a foreign Illinois Limited Liability
Company; MCDONALD, CARANO
WILSON LLP, a Nevada Limited Liability
Partnership; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS
COMMUNITY HOSPITAL, LTD, A
CALIFORNIA LP, a California Limited
Partnership; VALLEY OPEN MRI, LLC, a

**VOLUNTARY DISMISSAL OF
DEFENDANT SCREEN ACTORS
GUILD, INC.**

1 California Limited Liability Company; and
2 DOES I-V, inclusive; and ROE
CORPORATIONS VI-X, inclusive,

3 Defendants.
4

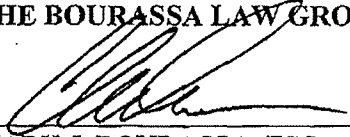
5 **VOLUNTARY DISMISSAL OF DEFENDANT**
6 **SCREEN ACTORS GUILD, INC.**

7 COMES NOW, Plaintiff, THE BOURASSA LAW GROUP, LLC, by and through its
8 attorneys of record Mark J. Bourassa, Esq. and Christopher W. Carson, Esq., and hereby
9 voluntarily dismisses Defendant, SCREEN ACTORS GUILD, INC. only, without prejudice, with
10 each party to bear their own fees and costs incurred herein. Said Defendant has yet to be served
11 with the Summons and Complaint, therefore, filing no answer or opposition, or otherwise appear
12 herein.

13
14 This voluntary dismissal is made in good faith, in the interests of judicial economy and
15 not for purposes of delay.

16 DATED this 4th day of January, 2012.

17 **THE BOURASSA LAW GROUP, LLC**

18
19 
20 MARK J. BOURASSA, ESQ.
Nevada Bar No. 7999
21 CHRISTOPHER W. CARSON, ESQ.
Nevada Bar No. 9523
22 8668 Spring Mountain Road, Suite 101
Las Vegas, Nevada 89117
23 Telephone: (702) 851-2180
Facsimile: (702) 851-2189

24 *Attorneys for Plaintiff*
25
26
27
28

1 **CERTIFICATE OF SERVICE**

2 I HEREBY CERTIFY that on the 4th day of January, 2012, I served a true and correct
3 copy of the foregoing document entitled **VOLUNTARY DISMISSAL OF DEFENDANT**
4 **SCREEN ACTORS GUILD, INC.** via Electronic Service and/or US Mail, postage prepaid, to
5 the following persons:
6

7 George F. Ogilvie, III, Esq.
8 Patrick J. Murch, Esq.
9 McDonald Carano Wilson, LLP
2300 West Sahara Avenue, Ste. #1000
Las Vegas, Nevada 89102

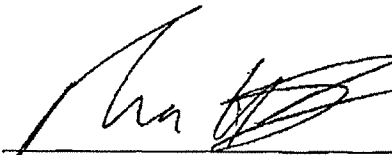
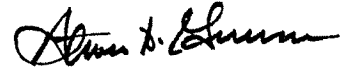
10
11 
12 _____
An Employee of The Bourassa Law Group, LLC
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Exhibit C-5



CLERK OF THE COURT

1 VDSM
2 GEORGE F. OGILVIE III, ESQ.
3 Nevada Bar No. 3552
4 PATRICK J. MURCH, ESQ.
5 Nevada Bar No. 10162
6 McDONALD CARANO WILSON LLP
7 2300 West Sahara Avenue, Suite 1000
8 Las Vegas, Nevada 89102
9 gogilvie@mcdonaldcarano.com
10 pmurch@mcdonaldcarano.com
11 Telephone: (702) 873-4100
12 Facsimile: (702) 873-9966

13 *Attorneys for McDonald Carano Wilson LLP*

14 **DISTRICT COURT**

15 **CLARK COUNTY, NEVADA**

16 THE BOURASSA LAW GROUP, LLC

17 Plaintiff,

18 vs.

Case No.: A651563

Dept. No.: XXVIII

**VOLUNTARY DISMISSAL OF
CROSS-CLAIM DEFENDANT
SCREEN ACTORS GUILD, INC.**

19 CALIFORNIA BACK SPECIALISTS MEDICAL
20 GROUP, INC., a California corporation;
21 CALIFORNIA MINIMALLY INVASIVE
22 SURGERY CENTER, an unknown entity;
23 CONEJO NEUROLOGICAL MEDICAL
24 GROUP, INC., a California corporation; LOS
25 ANGELES ORTHOPAEDIC INSTITUTE, INC.,
26 a California corporation; MEDICAL IMAGING
27 MEDICAL GROUP, an unknown entity;
28 MOUNTAIN VIEW SURGICAL CENTER, INC.,
a California corporation; CHARLES K. NEAL, an
individual; QUEST DIAGNOSTICS WEST
HILLS, a foreign Delaware corporation; SCREEN
ACTORS GUILD, INC., a California corporation;
THOUSAND OAKS SPINE MEDICAL GROUP,
INC., a California corporation; STEVEN ZLATT,
M.D., INC., a California corporation; OASIS
LEGAL FINANCE, LLC, a foreign Illinois limited
liability company; McDONALD CARANO
WILSON LLP, a Nevada limited liability
partnership; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS COMMUNITY
HOSPITAL, LTD., A CALIFORNIA LP, a
California limited partnership; VALLEY OPEN
MRI, LLC, a California limited liability company;
and DOES I-V, inclusive; and ROE
CORPORATIONS VI-X, inclusive,

Defendants.

McDONALD·CARANO·WILSON
2300 WEST SAHARA AVENUE • SUITE 1000 • LAS VEGAS, NEVADA 89102-4354
PHONE (702) 873-4100 • FAX (702) 873-9966

1 McDONALD CARANO WILSON LLP, a Nevada
2 limited liability partnership,

3 Counterclaimant,

4 vs.

5 THE BOURASSA LAW GROUP, LLC, a Nevada
6 limited liability company; and DOES I-V,
7 inclusive; and ROE CORPORATIONS VI-X,
8 inclusive,

8 Counterclaim Defendants.

9 McDONALD CARANO WILSON LLP, a Nevada
10 limited liability partnership,

11 Cross-Claimant,

12 vs.

13 CALIFORNIA BACK SPECIALISTS MEDICAL
14 GROUP, INC., a California corporation;
15 CALIFORNIA MINIMALLY INVASIVE
16 SURGERY CENTER, an unknown entity;
17 CONEJO NEUROLOGICAL MEDICAL
18 GROUP, INC., a California corporation; LOS
19 ANGELES ORTHOPAEDIC INSTITUTE, INC.,
20 a California corporation; MEDICAL IMAGING
21 MEDICAL GROUP, an unknown entity;
22 MOUNTAIN VIEW SURGICAL CENTER, INC.,
23 a California corporation; CHARLES K. NEAL, an
24 individual; QUEST DIAGNOSTICS WEST
25 HILLS, a foreign Delaware corporation; SCREEN
26 ACTORS GUILD, INC., a California corporation;
27 THOUSAND OAKS SPINE MEDICAL GROUP,
28 INC., a California corporation; STEVEN ZLATT,
M.D., INC., a California corporation; OASIS
LEGAL FINANCE, LLC, a foreign Illinois limited
liability company; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS COMMUNITY
HOSPITAL, LTD., A CALIFORNIA LP, a
California limited partnership; VALLEY OPEN
MRI, LLC, a California limited liability company;
and DOES I-V, inclusive; and ROE
CORPORATIONS VI-X, inclusive,

Cross-Claim Defendants.

1 Defendant/Counterclaimant/Cross-Claimant McDonald Carano Wilson LLP hereby
2 voluntarily dismisses its cross-claim against defendant/cross-claim defendant Screen Actors
3 Guild, Inc. only, without prejudice, with each party to bear its own fees and costs incurred herein.
4 Screen Actors Guild, Inc. has yet to be served with the summons and cross-claim, and has filed
5 no answer or opposition, or otherwise appeared herein.

6 This voluntary dismissal is made in good faith, in the interest of judicial economy and not
7 for purposes of delay.

8 DATED this 3rd day of May 2012.

10 McDONALD CARANO WILSON LLP

11 By: /s/ Patrick J. Murch

12 George F. Ogilvie III, Esq. (#3552)

13 Patrick J. Murch, Esq. (#10162)

14 2300 West Sahara Avenue, Suite 1000

15 Las Vegas, Nevada 89102

16 *Attorneys for McDonald Carano Wilson LLP*

17 246803

Exhibit C-6

1 **VDSM**

2 MARK J. BOURASSA, ESQ.

3 Nevada Bar No. 7999

4 CHRISTOPHER W. CARSON, ESQ.

5 Nevada Bar No. 9523

6 **THE BOURASSA LAW GROUP, LLC**

7 8668 Spring Mountain Road, Suite #101

8 Las Vegas, Nevada 89117

9 Telephone: (702) 851-2180

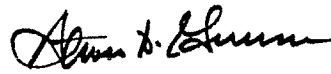
10 Facsimile: (702) 851-2189

11 mbourassa@bourassalawgroup.com

12 ccarson@bourassalawgroup.com

13 *Attorneys for Plaintiff*

Electronically Filed
12/30/2011 03:42:42 PM



CLERK OF THE COURT

14 **DISTRICT COURT**

15 **CLARK COUNTY, NEVADA**

16 THE BOURASSA LAW GROUP, LLC,

17 Plaintiff,

18 vs.

19 CALIFORNIA BACK SPECIALISTS
20 MEDICAL GROUP, INC., a California
21 Corporation; CALIFORNIA MINIMALLY
22 INVASIVE SURGERY CENTER, an
23 unknown entity; CONEJO NEUROLOGICAL
24 MEDICAL GROUP, INC., a California
25 Corporation; LOS ANGELES
26 ORTHOPAEDIC INSTITUTE, INC., a
27 California Corporation; MEDICAL
28 IMAGING MEDICAL GROUP, an unknown
entity; MOUNTAIN VIEW SURGICAL
CENTER, INC., a California Corporation;
CHARLES K. NEAL, an individual; QUEST
DIAGNOSTICS WEST HILLS, a foreign
Delaware Corporation; SCREEN ACTORS
GUILD, INC., a California Corporation;
THOUSAND OAKS SPINE MEDICAL
GROUP, INC., a California Corporation;
STEVEN ZLATT, M.D., INC., a California
Corporation; OASIS LEGAL FINANCE,
LLC, a foreign Illinois Limited Liability
Company; MCDONALD, CARANO
WILSON LLP, a Nevada Limited Liability
Partnership; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS
COMMUNITY HOSPITAL, LTD, A
CALIFORNIA LP, a California Limited
Partnership; VALLEY OPEN MRI, LLC, a

CASE NO.: A651563

DEPT NO.: XXVIII

**VOLUNTARY DISMISSAL OF
DEFENDANT QUEST
DIAGNOSTICS WEST HILLS**

1 California Limited Liability Company; and
2 DOES I-V, inclusive; and ROE
CORPORATIONS VI-X, inclusive,

3 Defendants.
4

5 **VOLUNTARY DISMISSAL OF DEFENDANT**
6 **QUEST DIAGNOSTICS WEST HILLS**

7 COMES NOW, Plaintiff, THE BOURASSA LAW GROUP, LLC, by and through its
8 attorneys of record Mark J. Bourassa, Esq. and Christopher W. Carson, Esq., and hereby
9 voluntarily dismisses Defendant, QUEST DIAGNOSTICS WEST HILLS only, without
10 prejudice, with each party to bear their own fees and costs incurred herein. Said Defendant has
11 yet to be served with the Summons and Complaint, therefore, filing no answer or opposition, or
12 otherwise appear herein.
13

14 This voluntary dismissal is made in good faith, in the interests of judicial economy and
15 not for purposes of delay.

16 DATED this 28th day of December, 2011.

17 **THE BOURASSA LAW GROUP, LLC**

18
19
20 **MARK J. BOURASSA, ESQ.**

Nevada Bar No. 7999

CHRISTOPHER W. CARSON, ESQ.

Nevada Bar No. 9523

8668 Spring Mountain Road, Suite #101

Las Vegas, Nevada 89117

Telephone: (702) 851-2180

Facsimile: (702) 851-2189

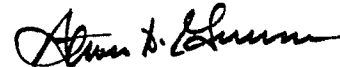
24
25 *Attorneys for Plaintiff*
26
27
28

Exhibit C-7

VDSM
GEORGE F. OGILVIE III, ESQ.
Nevada Bar No. 3552
PATRICK J. MURCH, ESQ.
Nevada Bar No. 10162
McDONALD CARANO WILSON LLP
2300 West Sahara Avenue, Suite 1000
Las Vegas, Nevada 89102
gogilvie@mcdonaldcarano.com
pmurch@mcdonaldcarano.com
Telephone: (702) 873-4100
Facsimile: (702) 873-9966

Attorneys for McDonald Carano Wilson LLP

Electronically Filed
05/03/2012 01:15:10 PM



CLERK OF THE COURT

DISTRICT COURT
CLARK COUNTY, NEVADA

THE BOURASSA LAW GROUP, LLC

Plaintiff,

vs.

CALIFORNIA BACK SPECIALISTS MEDICAL GROUP, INC., a California corporation;
CALIFORNIA MINIMALLY INVASIVE SURGERY CENTER, an unknown entity;
CONEJO NEUROLOGICAL MEDICAL GROUP, INC., a California corporation; LOS ANGELES ORTHOPAEDIC INSTITUTE, INC., a California corporation; MEDICAL IMAGING MEDICAL GROUP, an unknown entity;
MOUNTAIN VIEW SURGICAL CENTER, INC., a California corporation; CHARLES K. NEAL, an individual; QUEST DIAGNOSTICS WEST HILLS, a foreign Delaware corporation; SCREEN ACTORS GUILD, INC., a California corporation; THOUSAND OAKS SPINE MEDICAL GROUP, INC., a California corporation; STEVEN ZLATT, M.D., INC., a California corporation; OASIS LEGAL FINANCE, LLC, a foreign Illinois limited liability company; McDONALD CARANO WILSON LLP, a Nevada limited liability partnership; IMAGING CENTER OF THE VALLEY AT SHERMAN OAKS COMMUNITY HOSPITAL, LTD., A CALIFORNIA LP, a California limited partnership; VALLEY OPEN MRI, LLC, a California limited liability company; and DOES I-V, inclusive; and ROE CORPORATIONS VI-X, inclusive,

Defendants.

Case No.: A651563
Dept. No.: XXVIII

VOLUNTARY DISMISSAL OF CROSS-CLAIM DEFENDANT QUEST DIAGNOSTICS WEST HILLS

1 McDONALD CARANO WILSON LLP, a Nevada
2 limited liability partnership,

3 Counterclaimant,

4 vs.

5 THE BOURASSA LAW GROUP, LLC, a Nevada
6 limited liability company; and DOES I-V,
7 inclusive; and ROE CORPORATIONS VI-X,
8 inclusive,

8 Counterclaim Defendants.

9 McDONALD CARANO WILSON LLP, a Nevada
10 limited liability partnership,

11 Cross-Claimant,

12 vs.

13 CALIFORNIA BACK SPECIALISTS MEDICAL
14 GROUP, INC., a California corporation;
15 CALIFORNIA MINIMALLY INVASIVE
16 SURGERY CENTER, an unknown entity;
17 CONEJO NEUROLOGICAL MEDICAL
18 GROUP, INC., a California corporation; LOS
19 ANGELES ORTHOPAEDIC INSTITUTE, INC.,
20 a California corporation; MEDICAL IMAGING
21 MEDICAL GROUP, an unknown entity;
22 MOUNTAIN VIEW SURGICAL CENTER, INC.,
23 a California corporation; CHARLES K. NEAL, an
24 individual; QUEST DIAGNOSTICS WEST
25 HILLS, a foreign Delaware corporation; SCREEN
26 ACTORS GUILD, INC., a California corporation;
27 THOUSAND OAKS SPINE MEDICAL GROUP,
28 INC., a California corporation; STEVEN ZLATT,
M.D., INC., a California corporation; OASIS
LEGAL FINANCE, LLC, a foreign Illinois limited
liability company; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS COMMUNITY
HOSPITAL, LTD., A CALIFORNIA LP, a
California limited partnership; VALLEY OPEN
MRI, LLC, a California limited liability company;
and DOES I-V, inclusive; and ROE
CORPORATIONS VI-X, inclusive,

Cross-Claim Defendants.

Defendant/Counterclaimant/Cross-Claimant McDonald Carano Wilson LLP hereby voluntarily dismisses its cross-claim against defendant/cross-claim defendant Quest Diagnostics West Hills only, without prejudice, with each party to bear its own fees and costs incurred herein. Quest Diagnostics West Hills has yet to be served with the summons and cross-claim, and has filed no answer or opposition, or otherwise appeared herein.

This voluntary dismissal is made in good faith, in the interest of judicial economy and not for purposes of delay.

DATED this 3rd day of May 2012.

McDONALD CARANO WILSON LLP

By: /s/ Patrick J. Murch

George F. Ogilvie III, Esq. (#3552)

Patrick J. Murch, Esq. (#10162)

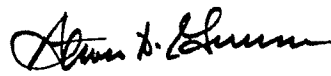
2300 West Sahara Avenue, Suite 1000

Las Vegas, Nevada 89102

Attorneys for McDonald Carano Wilson LLP

246814

Exhibit C-8



CLERK OF THE COURT

1 **VDSM**
2 MARK J. BOURASSA, ESQ.
3 Nevada Bar No. 7999
4 CHRISTOPHER W. CARSON, ESQ.
5 Nevada Bar No. 9523
6 **THE BOURASSA LAW GROUP, LLC**
7 3025 W. Sahara Ave. Suite 105
8 Las Vegas, Nevada 89102
9 Telephone: (702) 851-2180
10 Facsimile: (702) 851-2189
11 mbourassa@bourassalawgroup.com
12 ccarson@bourassalawgroup.com

13 *Attorneys for Plaintiff*

14 **DISTRICT COURT**
15 **CLARK COUNTY, NEVADA**

16 THE BOURASSA LAW GROUP, LLC,
17
18 Plaintiff,
19
20 vs.

CASE NO.: A651563

DEPT NO.: XXVIII

21 CALIFORNIA BACK SPECIALISTS
22 MEDICAL GROUP, INC., a California
23 Corporation; CALIFORNIA MINIMALLY
24 INVASIVE SURGERY CENTER, an
25 unknown entity; CONEJO NEUROLOGICAL
26 MEDICAL GROUP, INC., a California
27 Corporation; LOS ANGELES
28 ORTHOPAEDIC INSTITUTE, INC., a
California Corporation; MEDICAL
IMAGING MEDICAL GROUP, an unknown
entity; MOUNTAIN VIEW SURGICAL
CENTER, INC., a California Corporation;
CHARLES K. NEAL, an individual; QUEST
DIAGNOSTICS WEST HILLS, a foreign
Delaware Corporation; SCREEN ACTORS
GUILD, INC., a California Corporation;
THOUSAND OAKS SPINE MEDICAL
GROUP, INC., a California Corporation;
STEVEN ZLATT, M.D., INC., a California
Corporation; OASIS LEGAL FINANCE,
LLC, a foreign Illinois Limited Liability
Company; MCDONALD, CARANO
WILSON LLP, a Nevada Limited Liability
Partnership; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS
COMMUNITY HOSPITAL, LTD, A
CALIFORNIA LP, a California Limited
Partnership; VALLEY OPEN MRI, LLC, a

**VOLUNTARY DISMISSAL OF
DEFENDANT CHARLES K. NEAL,
M.D.**

1 California Limited Liability Company; and
2 DOES I-V, inclusive; and ROE
CORPORATIONS VI-X, inclusive,

3 Defendants.
4

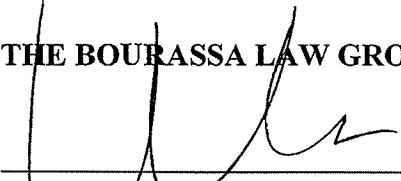
5 **VOLUNTARY DISMISSAL OF DEFENDANT**
6 **CHARLES K. NEAL, M.D.**

7 COMES NOW, Plaintiff, THE BOURASSA LAW GROUP, LLC, by and through its
8 attorneys of record Mark J. Bourassa, Esq. and Christopher W. Carson, Esq., and hereby
9 voluntarily dismisses Defendant, CHARLES K. NEAL, M.D., only, without prejudice, with each
10 party to bear their own fees and costs incurred herein. Said Defendant has yet to be served with
11 the Summons and Complaint, therefore, filing no answer or opposition, or otherwise appear
12 herein.

13
14 This voluntary dismissal is made in good faith, in the interests of judicial economy and
15 not for purposes of delay.

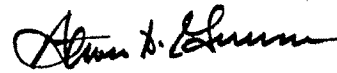
16 DATED this 30th day of November, 2011.

17 **THE BOURASSA LAW GROUP, LLC**

18
19 
20 MARK J. BOURASSA, ESQ.
Nevada Bar No. 7999
21 CHRISTOPHER W. CARSON, ESQ.
Nevada Bar No. 9523
22 3025 W. Sahara Ave., Suite 105
Las Vegas, Nevada 89102
23 Telephone: (702) 851-2180
Facsimile: (702) 851-2189

24 *Attorneys for Plaintiff*
25
26
27
28

Exhibit C-9



CLERK OF THE COURT

1 **VDSM**
2 GEORGE F. OGILVIE III, ESQ.
3 Nevada Bar No. 3552
4 PATRICK J. MURCH, ESQ.
5 Nevada Bar No. 10162
6 McDONALD CARANO WILSON LLP
7 2300 West Sahara Avenue, Suite 1000
8 Las Vegas, Nevada 89102
9 gogilvie@mcdonaldcarano.com
10 pmurch@mcdonaldcarano.com
11 Telephone: (702) 873-4100
12 Facsimile: (702) 873-9966

13 *Attorneys for McDonald Carano Wilson LLP*

14 **DISTRICT COURT**

15 **CLARK COUNTY, NEVADA**

16 THE BOURASSA LAW GROUP, LLC
17
18 Plaintiff,

19 vs.

20 CALIFORNIA BACK SPECIALISTS MEDICAL
21 GROUP, INC., a California corporation;
22 CALIFORNIA MINIMALLY INVASIVE
23 SURGERY CENTER, an unknown entity;
24 CONEJO NEUROLOGICAL MEDICAL
25 GROUP, INC., a California corporation; LOS
26 ANGELES ORTHOPAEDIC INSTITUTE, INC.,
27 a California corporation; MEDICAL IMAGING
28 MEDICAL GROUP, an unknown entity;
MOUNTAIN VIEW SURGICAL CENTER, INC.,
a California corporation; CHARLES K. NEAL, an
individual; QUEST DIAGNOSTICS WEST
HILLS, a foreign Delaware corporation; SCREEN
ACTORS GUILD, INC., a California corporation;
THOUSAND OAKS SPINE MEDICAL GROUP,
INC., a California corporation; STEVEN ZLATT,
M.D., INC., a California corporation; OASIS
LEGAL FINANCE, LLC, a foreign Illinois limited
liability company; McDONALD CARANO
WILSON LLP, a Nevada limited liability
partnership; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS COMMUNITY
HOSPITAL, LTD., A CALIFORNIA LP, a
California limited partnership; VALLEY OPEN
MRI, LLC, a California limited liability company;
and DOES I-V, inclusive; and ROE
CORPORATIONS VI-X, inclusive,

Defendants.

Case No.: A651563
Dept. No.: XXVIII

**VOLUNTARY DISMISSAL OF CROSS-
CLAIM DEFENDANT CHARLES K.
NEAL, M.D.**

1 McDONALD CARANO WILSON LLP, a Nevada
2 limited liability partnership,

3 Counterclaimant,

4 vs.

5 THE BOURASSA LAW GROUP, LLC, a Nevada
6 limited liability company; and DOES I-V,
7 inclusive; and ROE CORPORATIONS VI-X,
8 inclusive,

8 Counterclaim Defendants.

9 McDONALD CARANO WILSON LLP, a Nevada
10 limited liability partnership,

11 Cross-Claimant,

12 vs.

13 CALIFORNIA BACK SPECIALISTS MEDICAL
14 GROUP, INC., a California corporation;
15 CALIFORNIA MINIMALLY INVASIVE
16 SURGERY CENTER, an unknown entity;
17 CONEJO NEUROLOGICAL MEDICAL
18 GROUP, INC., a California corporation; LOS
19 ANGELES ORTHOPAEDIC INSTITUTE, INC.,
20 a California corporation; MEDICAL IMAGING
21 MEDICAL GROUP, an unknown entity;
22 MOUNTAIN VIEW SURGICAL CENTER, INC.,
23 a California corporation; CHARLES K. NEAL, an
24 individual; QUEST DIAGNOSTICS WEST
25 HILLS, a foreign Delaware corporation; SCREEN
26 ACTORS GUILD, INC., a California corporation;
27 THOUSAND OAKS SPINE MEDICAL GROUP,
28 INC., a California corporation; STEVEN ZLATT,
M.D., INC., a California corporation; OASIS
LEGAL FINANCE, LLC, a foreign Illinois limited
liability company; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS COMMUNITY
HOSPITAL, LTD., A CALIFORNIA LP, a
California limited partnership; VALLEY OPEN
MRI, LLC, a California limited liability company;
and DOES I-V, inclusive; and ROE
CORPORATIONS VI-X, inclusive,

Cross-Claim Defendants.

1 Defendant/Counterclaimant/Cross-Claimant McDonald Carano Wilson LLP hereby
2 voluntarily dismisses its cross-claim against defendant/cross-claim defendant Charles K. Neal,
3 M.D. only, without prejudice, with each party to bear its own fees and costs incurred herein.
4 Charles K. Neal, M.D. has yet to be served with the summons and cross-claim, and has filed no
5 answer or opposition, or otherwise appeared herein.

6 This voluntary dismissal is made in good faith, in the interest of judicial economy and not
7 for purposes of delay.

8 DATED this 3rd day of May 2012.

10 McDONALD CARANO WILSON LLP

11 By: /s/ Patrick J. Murch

12 George F. Ogilvie III, Esq. (#3552)

13 Patrick J. Murch, Esq. (#10162)

14 2300 West Sahara Avenue, Suite 1000

15 Las Vegas, Nevada 89102

16 *Attorneys for McDonald Carano Wilson LLP*

17 246815

Exhibit C-10

1 **VDSM**

2 MARK J. BOURASSA, ESQ.

3 Nevada Bar No. 7999

4 CHRISTOPHER W. CARSON, ESQ.

5 Nevada Bar No. 9523

6 **THE BOURASSA LAW GROUP, LLC**

7 3025 W. Sahara Ave. Suite 105

8 Las Vegas, Nevada 89102

9 Telephone: (702) 851-2180

10 Facsimile: (702) 851-2189

11 mbourassa@bourassalawgroup.com

12 ccarson@bourassalawgroup.com

13 *Attorneys for Plaintiff*

14 **DISTRICT COURT**

15 **CLARK COUNTY, NEVADA**

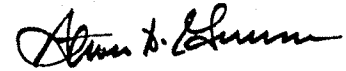
16 THE BOURASSA LAW GROUP, LLC,

17 Plaintiff,

18 vs.

19 CALIFORNIA BACK SPECIALISTS
20 MEDICAL GROUP, INC., a California
21 Corporation; CALIFORNIA MINIMALLY
22 INVASIVE SURGERY CENTER, an
23 unknown entity; CONEJO NEUROLOGICAL
24 MEDICAL GROUP, INC., a California
25 Corporation; LOS ANGELES
26 ORTHOPAEDIC INSTITUTE, INC., a
27 California Corporation; MEDICAL
28 IMAGING MEDICAL GROUP, an unknown
entity; MOUNTAIN VIEW SURGICAL
CENTER, INC., a California Corporation;
CHARLES K. NEAL, an individual; QUEST
DIAGNOSTICS WEST HILLS, a foreign
Delaware Corporation; SCREEN ACTORS
GUILD, INC., a California Corporation;
THOUSAND OAKS SPINE MEDICAL
GROUP, INC., a California Corporation;
STEVEN ZLATT, M.D., INC., a California
Corporation; OASIS LEGAL FINANCE,
LLC, a foreign Illinois Limited Liability
Company; MCDONALD, CARANO
WILSON LLP, a Nevada Limited Liability
Partnership; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS
COMMUNITY HOSPITAL, LTD, A
CALIFORNIA LP, a California Limited
Partnership; VALLEY OPEN MRI, LLC, a

Electronically Filed
12/09/2011 10:31:35 AM



CLERK OF THE COURT

CASE NO.: A651563

DEPT NO.: XXVIII

**VOLUNTARY DISMISSAL OF
DEFENDANT MOUNTAIN VIEW
SURGICAL CENTER, INC.**

1 California Limited Liability Company; and
2 DOES I-V, inclusive; and ROE
CORPORATIONS VI-X, inclusive,

3 Defendants.
4

5 **VOLUNTARY DISMISSAL OF DEFENDANT**
6 **MOUNTAIN VIEW SURGICAL CENTER, INC.**

7 COMES NOW, Plaintiff, THE BOURASSA LAW GROUP, LLC, by and through its
8 attorneys of record Mark J. Bourassa, Esq. and Christopher W. Carson, Esq., and hereby
9 voluntarily dismisses Defendant, MOUNTAIN VIEW SURGICAL CENTER, INC., only,
10 without prejudice, with each party to bear their own fees and costs incurred herein. Said
11 Defendant has yet to be served with the Summons and Complaint, therefore, filing no answer or
12 opposition, or otherwise appear herein.

13 This voluntary dismissal is made in good faith, in the interests of judicial economy and
14 not for purposes of delay.

15 DATED this 30th day of November, 2011.

17 **THE BOURASSA LAW GROUP, LLC**

18
19 **MARK J. BOURASSA, ESQ.**

Nevada Bar No. 7999

20 **CHRISTOPHER W. CARSON, ESQ.**

Nevada Bar No. 9523

21 3025 W. Sahara Ave., Suite 105

22 Las Vegas, Nevada 89102

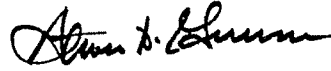
23 Telephone: (702) 851-2180

24 Facsimile: (702) 851-2189

25 *Attorneys for Plaintiff*
26
27
28

Exhibit C-11

Electronically Filed
05/03/2012 01:14:26 PM



CLERK OF THE COURT

VDSM
GEORGE F. OGILVIE III, ESQ.
Nevada Bar No. 3552
PATRICK J. MURCH, ESQ.
Nevada Bar No. 10162
McDONALD CARANO WILSON LLP
2300 West Sahara Avenue, Suite 1000
Las Vegas, Nevada 89102
gogilvie@mcdonaldcarano.com
pmurch@mcdonaldcarano.com
Telephone: (702) 873-4100
Facsimile: (702) 873-9966

Attorneys for McDonald Carano Wilson LLP

DISTRICT COURT

CLARK COUNTY, NEVADA

THE BOURASSA LAW GROUP, LLC

Plaintiff,

vs.

CALIFORNIA BACK SPECIALISTS MEDICAL
GROUP, INC., a California corporation;
CALIFORNIA MINIMALLY INVASIVE
SURGERY CENTER, an unknown entity;
CONEJO NEUROLOGICAL MEDICAL
GROUP, INC., a California corporation; LOS
ANGELES ORTHOPAEDIC INSTITUTE, INC.,
a California corporation; MEDICAL IMAGING
MEDICAL GROUP, an unknown entity;
MOUNTAIN VIEW SURGICAL CENTER, INC.,
a California corporation; CHARLES K. NEAL, an
individual; QUEST DIAGNOSTICS WEST
HILLS, a foreign Delaware corporation; SCREEN
ACTORS GUILD, INC., a California corporation;
THOUSAND OAKS SPINE MEDICAL GROUP,
INC., a California corporation; STEVEN ZLATT,
M.D., INC., a California corporation; OASIS
LEGAL FINANCE, LLC, a foreign Illinois limited
liability company; McDONALD CARANO
WILSON LLP, a Nevada limited liability
partnership; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS COMMUNITY
HOSPITAL, LTD., A CALIFORNIA LP, a
California limited partnership; VALLEY OPEN
MRI, LLC, a California limited liability company;
and DOES I-V, inclusive; and ROE
CORPORATIONS VI-X, inclusive,

Defendants.

Case No.: A651563
Dept. No.: XXVIII

**VOLUNTARY DISMISSAL OF CROSS-
CLAIM DEFENDANT MOUNTAIN
VIEW SURGICAL CENTER, INC.**

McDONALD-CARANO-WILSON
2300 WEST SAHARA AVENUE • SUITE 1000 • LAS VEGAS, NEVADA 89102-4354
PHONE (702) 873-4100 • FAX (702) 873-9966

1 McDONALD CARANO WILSON LLP, a Nevada
2 limited liability partnership,
3
4 Counterclaimant,
5
6 vs.
7
8 THE BOURASSA LAW GROUP, LLC, a Nevada
9 limited liability company; and DOES I-V,
10 inclusive; and ROE CORPORATIONS VI-X,
11 inclusive,
12
13 Counterclaim Defendants.
14
15 McDONALD CARANO WILSON LLP, a Nevada
16 limited liability partnership,
17
18 Cross-Claimant,
19
20 vs.
21
22 CALIFORNIA BACK SPECIALISTS MEDICAL
23 GROUP, INC., a California corporation;
24 CALIFORNIA MINIMALLY INVASIVE
25 SURGERY CENTER, an unknown entity;
26 CONEJO NEUROLOGICAL MEDICAL
27 GROUP, INC., a California corporation; LOS
28 ANGELES ORTHOPAEDIC INSTITUTE, INC.,
a California corporation; MEDICAL IMAGING
MEDICAL GROUP, an unknown entity;
MOUNTAIN VIEW SURGICAL CENTER, INC.,
a California corporation; CHARLES K. NEAL, an
individual; QUEST DIAGNOSTICS WEST
HILLS, a foreign Delaware corporation; SCREEN
ACTORS GUILD, INC., a California corporation;
THOUSAND OAKS SPINE MEDICAL GROUP,
INC., a California corporation; STEVEN ZLATT,
M.D., INC., a California corporation; OASIS
LEGAL FINANCE, LLC, a foreign Illinois limited
liability company; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS COMMUNITY
HOSPITAL, LTD., A CALIFORNIA LP, a
California limited partnership; VALLEY OPEN
MRI, LLC, a California limited liability company;
and DOES I-V, inclusive; and ROE
CORPORATIONS VI-X, inclusive,

Cross-Claim Defendants.

1 Defendant/Counterclaimant/Cross-Claimant McDonald Carano Wilson LLP hereby
2 voluntarily dismisses its cross-claim against defendant/cross-claim defendant Mountain View
3 Surgical Center, Inc. only, without prejudice, with each party to bear its own fees and costs
4 incurred herein. Mountain View Surgical Center, Inc. has yet to be served with the summons and
5 cross-claim, and has filed no answer or opposition, or otherwise appeared herein.

6 This voluntary dismissal is made in good faith, in the interest of judicial economy and not
7 for purposes of delay.

8 DATED this 3rd day of May 2012.

10 McDONALD CARANO WILSON LLP

11 By: /s/ Patrick J. Murch

12 George F. Ogilvie III, Esq. (#3552)

13 Patrick J. Murch, Esq. (#10162)

14 2300 West Sahara Avenue, Suite 1000

15 Las Vegas, Nevada 89102

16 *Attorneys for McDonald Carano Wilson LLP*

17 246813

Exhibit D

1 **NEDJ**

2 **MARK J. BOURASSA, ESQ.**

3 Nevada Bar No. 7999

4 **CHRISTOPHER W. CARSON, ESQ.**

5 Nevada Bar No. 9523

6 **THE BOURASSA LAW GROUP, LLC**

7 8668 Spring Mountain Road, Suite 101

8 Las Vegas, Nevada 89117

9 Telephone: (702) 851-2180

10 Facsimile: (702) 851-2189

11 mbourassa@bourassalawgroup.com

12 ccarson@bourassalawgroup.com

13 *Attorneys for Plaintiff*

14 **DISTRICT COURT**

15 **CLARK COUNTY, NEVADA**

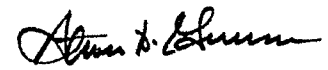
16 **THE BOURASSA LAW GROUP, LLC,**

17 Plaintiff,

18 vs.

19 CALIFORNIA BACK SPECIALISTS
20 MEDICAL GROUP, INC., a California
21 Corporation; CALIFORNIA MINIMALLY
22 INVASIVE SURGERY CENTER, an
23 unknown entity; CONEJO NEUROLOGICAL
24 MEDICAL GROUP, INC., a California
25 Corporation; LOS ANGELES
26 ORTHOPAEDIC INSTITUTE, INC., a
27 California Corporation; MEDICAL
28 IMAGING MEDICAL GROUP, an unknown
entity; MOUNTAIN VIEW SURGICAL
CENTER, INC., a California Corporation;
CHARLES K. NEAL, an individual; QUEST
DIAGNOSTICS WEST HILLS, a foreign
Delaware Corporation; SCREEN ACTORS
GUILD, INC., a California Corporation;
THOUSAND OAKS SPINE MEDICAL
GROUP, INC., a California Corporation;
STEVEN ZLATT, M.D., INC., a California
Corporation; OASIS LEGAL FINANCE,
LLC, a foreign Illinois Limited Liability
Company; MCDONALD, CARANO
WILSON LLP, a Nevada Limited Liability
Partnership; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS
COMMUNITY HOSPITAL, LTD, A
CALIFORNIA LP, a California Limited
Partnership; VALLEY OPEN MRI, LLC, a

Electronically Filed
09/05/2012 04:47:58 PM



CLERK OF THE COURT

CASE NO.: A651563

DEPT NO.: XXVIII

**NOTICE OF ENTRY OF DEFAULT
JUDGMENT OF DEFENDANT LOS
ANGELES ORTHOPAEDIC
INSTITUTE, INC.**

1 California Limited Liability Company; and
2 DOES I-V, inclusive; and ROE
3 CORPORATIONS VI-X, inclusive,
4 Defendants.

5 **NOTICE OF ENTRY OF DEFAULT OF DEFENDANT LOS ANGELES ORTHOPAEDIC**
6 **INSTITUTE, INC.**

7 YOU WILL PLEASE TAKE NOTICE that on or about the 5th day of September, 2012,
8 a Default of Defendant Los Angeles Orthopaedic Institute, Inc. was entered in the above-entitled
9 matter.

10 A copy is attached hereto as Exhibit "1".

11
12 Dated this 5th day of September 2012.

13
14 **THE BOURASSA LAW GROUP, LLC**

15 */s/ Christopher W. Carson*

16 MARK J. BOURASSA, ESQ.

17 Nevada Bar No. 7999

18 CHRISTOPHER W. CARSON, ESQ.

19 Nevada Bar No. 9523

20 TRENT L. RICHARDS, ESQ.

21 Nevada Bar No. 11448

22 8668 Spring Mountain Road, Suite 101

23 Las Vegas, Nevada 89117

24 Tel: (702) 851-2180

25 Fax: (702) 851-2189

26 *Attorneys for Plaintiff*

1 **CERTIFICATE OF SERVICE**

2 I HEREBY CERTIFY that on the 5th day of September, 2012 I served a true and correct
3 copy of the foregoing document entitled **NOTICE OF ENTRY OF DEFAULT JUDGMENT**
4 **OF DEFENDANT LOS ANGELES ORTHOPAEDIC INSTITUTE, INC.** via first class,
5 United States mail, postage prepaid addressed to the following persons:
6

7 Michelle L. Abrams, Esq.
8 4750 W. Flamingo Rd. Ste. B
9 Las Vegas, NV 89103
10 *Attorney for Oasis Legal Finance, LLC.*

11 Patrick J. Murch, Esq.
12 McDonald Carano Wilson LLP
13 2300 W. Sahara Ave., #10 Suite 1000
14 Las Vegas, NV 89102
15 *Attorneys for McDonald Carano Wilson LLP*

16 Jacqueline Mary McQuigg, Esq.
17 2620 Regalta Dr., Ste. 102
18 Las Vegas, NV 89128
19 *Attorney for the Chiu Entities*

20 James T. Studer, Esq.
21 1420 Los Angeles Avenue, Ste 203
22 Simi Valley, CA 93065
23 *Attorney for the Chiu Entities*

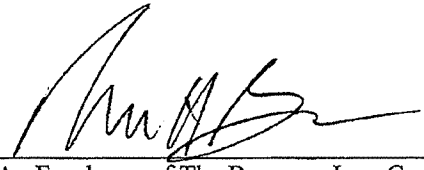
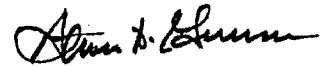
24
25
26
27
28

An Employee of The Bourassa Law Group, LLC

Exhibit D-1



CLERK OF THE COURT

1 **NEDJ**

2 **MARK J. BOURASSA, ESQ.**

3 Nevada Bar No. 7999

4 **CHRISTOPHER W. CARSON, ESQ.**

5 Nevada Bar No. 9523

6 **THE BOURASSA LAW GROUP, LLC**

7 8668 Spring Mountain Road, Suite 101

8 Las Vegas, Nevada 89117

9 Telephone: (702) 851-2180

10 Facsimile: (702) 851-2189

11 mbourassa@bourassalawgroup.com

12 ccarson@bourassalawgroup.com

13 *Attorneys for Plaintiff*

14 **DISTRICT COURT**
15 **CLARK COUNTY, NEVADA**

16 **THE BOURASSA LAW GROUP, LLC,**

17 **Plaintiff,**

18 **vs.**

CASE NO.: A651563

DEPT NO.: XXVIII

19 **CALIFORNIA BACK SPECIALISTS**
20 **MEDICAL GROUP, INC., a California**
21 **Corporation; CALIFORNIA MINIMALLY**
22 **INVASIVE SURGERY CENTER, an**
23 **unknown entity; CONEJO NEUROLOGICAL**
24 **MEDICAL GROUP, INC., a California**
25 **Corporation; LOS ANGELES**
26 **ORTHOPAEDIC INSTITUTE, INC., a**
27 **California Corporation; MEDICAL**
28 **IMAGING MEDICAL GROUP, an unknown**
entity; MOUNTAIN VIEW SURGICAL
CENTER, INC., a California Corporation;
CHARLES K. NEAL, an individual; QUEST
DIAGNOSTICS WEST HILLS, a foreign
Delaware Corporation; SCREEN ACTORS
GUILD, INC., a California Corporation;
THOUSAND OAKS SPINE MEDICAL
GROUP, INC., a California Corporation;
STEVEN ZLATT, M.D., INC., a California
Corporation; OASIS LEGAL FINANCE,
LLC, a foreign Illinois Limited Liability
Company; MCDONALD, CARANO
WILSON LLP, a Nevada Limited Liability
Partnership; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS
COMMUNITY HOSPITAL, LTD, A
CALIFORNIA LP, a California Limited
Partnership; VALLEY OPEN MRI, LLC, a

NOTICE OF ENTRY OF DEFAULT
JUDGMENT OF DEFENDANT
IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS
COMMUNITY HOSPITAL, LTD.

1 California Limited Liability Company; and
2 DOES I-V, inclusive; and ROE
3 CORPORATIONS VI-X, inclusive,
4 Defendants.

5 **NOTICE OF ENTRY OF DEFAULT OF DEFENDANT IMAGING CENTER OF THE**
6 **VALLEY AT SHERMAN OAKS COMMUNITY HOSPITAL, LTD.**

7 YOU WILL PLEASE TAKE NOTICE that on or about the 5th day of September, 2012,
8 a Default of Defendant Imaging Center of the Valley at Sherman Oaks Community Hospital,
9 LTD. was entered in the above-entitled matter.

10 A copy is attached hereto as Exhibit "1".

11
12 Dated this 5th day of September 2012.

13
14 **THE BOURASSA LAW GROUP, LLC**

15 */s/ Christopher W. Carson*

16
17 MARK J. BOURASSA, ESQ.
18 Nevada Bar No. 7999
19 CHRISTOPHER W. CARSON, ESQ.
20 Nevada Bar No. 9523
21 TRENT L. RICHARDS, ESQ.
22 Nevada Bar No. 11448
23 8668 Spring Mountain Road, Suite 101
24 Las Vegas, Nevada 89117
25 Tel: (702) 851-2180
26 Fax: (702) 851-2189
27 *Attorneys for Plaintiff*
28

1 **CERTIFICATE OF SERVICE**

2 I HEREBY CERTIFY that on the 5th day of September, 2012 I served a true and correct
3 copy of the foregoing document entitled **NOTICE OF ENTRY OF DEFAULT JUDGMENT**
4 **OF DEFENDANT IMAGING CENTER OF THE VALLEY AT SHERMAN OAKS**
5 **COMMUNITY HOSPITAL, LTD.** via first class, United States mail, postage prepaid

6 addressed to the following persons:

7
8 Michelle L. Abrams, Esq.
9 4750 W. Flamingo Rd. Ste. B
10 Las Vegas, NV 89103
11 *Attorney for Oasis Legal Finance, LLC.*

12 Patrick J. Murch, Esq.
13 McDonald Carano Wilson LLP
14 2300 W. Sahara Ave., #10 Suite 1000
15 Las Vegas, NV 89102
16 *Attorneys for McDonald Carano Wilson LLP*

17 Jacqueline Mary McQuigg, Esq.
18 2620 Regalta Dr., Ste. 102
19 Las Vegas, NV 89128
20 *Attorney for the Chiu Entities*

21 James T. Studer, Esq.
22 1420 Los Angeles Avenue, Ste 203
23 Simi Valley, CA 93065
24 *Attorney for the Chiu Entities*

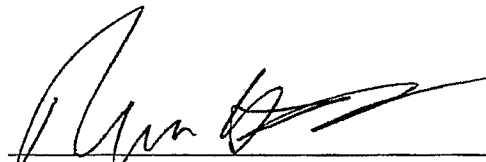
25
26
27
28

An Employee of The Bourassa Law Group, LLC

Exhibit D-2

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

NEDJ
MARK J. BOURASSA, ESQ.
Nevada Bar No. 7999
CHRISTOPHER W. CARSON, ESQ.
Nevada Bar No. 9523
THE BOURASSA LAW GROUP, LLC
8668 Spring Mountain Road, Suite 101
Las Vegas, Nevada 89117
Telephone: (702) 851-2180
Facsimile: (702) 851-2189
mbourassa@bourassalawgroup.com
ccarson@bourassalawgroup.com

Attorneys for Plaintiff

**DISTRICT COURT
CLARK COUNTY, NEVADA**

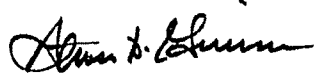
THE BOURASSA LAW GROUP, LLC,

Plaintiff,

vs.

CALIFORNIA BACK SPECIALISTS
MEDICAL GROUP, INC., a California
Corporation; CALIFORNIA MINIMALLY
INVASIVE SURGERY CENTER, an
unknown entity; CONEJO NEUROLOGICAL
MEDICAL GROUP, INC., a California
Corporation; LOS ANGELES
ORTHOPAEDIC INSTITUTE, INC., a
California Corporation; MEDICAL
IMAGING MEDICAL GROUP, an unknown
entity; MOUNTAIN VIEW SURGICAL
CENTER, INC., a California Corporation;
CHARLES K. NEAL, an individual; QUEST
DIAGNOSTICS WEST HILLS, a foreign
Delaware Corporation; SCREEN ACTORS
GUILD, INC., a California Corporation;
THOUSAND OAKS SPINE MEDICAL
GROUP, INC., a California Corporation;
STEVEN ZLATT, M.D., INC., a California
Corporation; OASIS LEGAL FINANCE,
LLC, a foreign Illinois Limited Liability
Company; MCDONALD, CARANO
WILSON LLP, a Nevada Limited Liability
Partnership; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS
COMMUNITY HOSPITAL, LTD, A
CALIFORNIA LP, a California Limited
Partnership; VALLEY OPEN MRI, LLC, a

Electronically Filed
09/05/2012 04:46:57 PM


CLERK OF THE COURT

CASE NO.: A651563

DEPT NO.: XXVIII

**NOTICE OF ENTRY OF DEFAULT
JUDGMENT OF DEFENDANT
STEVEN ZLATT, M.D., INC.**

1 California Limited Liability Company; and
2 DOES I-V, inclusive; and ROE
3 CORPORATIONS VI-X, inclusive,
4 Defendants.

5 **NOTICE OF ENTRY OF DEFAULT OF DEFENDANT STEVEN ZLATT, M.D., INC.**

6 YOU WILL PLEASE TAKE NOTICE that on or about the 5th day of September, 2012,
7 a Default of Defendant Steven Zlatt, M.D., Inc. was entered in the above-entitled matter.
8 A copy is attached hereto as Exhibit "1".
9

10 Dated this 5th day of September 2012.
11

12
13 **THE BOURASSA LAW GROUP, LLC**

14 */s/ Christopher W. Carson*

15 MARK J. BOURASSA, ESQ.

16 Nevada Bar No. 7999

17 CHRISTOPHER W. CARSON, ESQ.

Nevada Bar No. 9523

18 TRENT L. RICHARDS, ESQ.

Nevada Bar No. 11448

19 8668 Spring Mountain Road, Suite 101

20 Las Vegas, Nevada 89117

Tel: (702) 851-2180

21 Fax: (702) 851-2189

22 *Attorneys for Plaintiff*
23
24
25
26
27
28

1 CERTIFICATE OF SERVICE

2 I HEREBY CERTIFY that on the 5th day of September, 2012 I served a true and correct
3 copy of the foregoing document entitled NOTICE OF ENTRY OF DEFAULT JUDGMENT
4 OF DEFENDANT STEVEN ZLATT, M.D., INC. via first class, United States mail, postage
5 prepaid addressed to the following persons:
6

7 Michelle L. Abrams, Esq.
8 4750 W. Flamingo Rd. Ste. B
9 Las Vegas, NV 89103
10 *Attorney for Oasis Legal Finance, LLC.*

11 Patrick J. Murch, Esq.
12 McDonald Carano Wilson LLP
13 2300 W. Sahara Ave., #10 Suite 1000
14 Las Vegas, NV 89102
15 *Attorneys for McDonald Carano Wilson LLP*

16 Jacqueline Mary McQuigg, Esq.
17 2620 Regalta Dr., Ste. 102
18 Las Vegas, NV 89128
19 *Attorney for the Chiu Entities*

20 James T. Studer, Esq.
21 1420 Los Angeles Avenue, Ste 203
22 Simi Valley, CA 93065
23 *Attorney for the Chiu Entities*

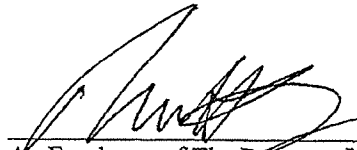
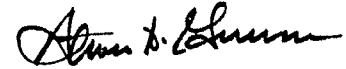
24
25
26
27
28

An Employee of The Bourassa Law Group, LLC

Exhibit D-3



CLERK OF THE COURT

NEDJ
GEORGE F. OGILVIE III, ESQ.
Nevada Bar No. 3552
PATRICK J. MURCH, ESQ.
Nevada Bar No. 10162
RORY T. KAY, ESQ.
Nevada Bar No. 12416
McDONALD CARANO WILSON LLP
2300 West Sahara Avenue, Suite 1000
Las Vegas, Nevada 89102
(702) 873-4100
Attorneys for McDonald Carano Wilson LLP

DISTRICT COURT

CLARK COUNTY, NEVADA

THE BOURASSA LAW GROUP, LLC

Plaintiff,

vs.

CALIFORNIA BACK SPECIALISTS MEDICAL GROUP, INC., a California corporation; CALIFORNIA MINIMALLY INVASIVE SURGERY CENTER, an unknown entity; CONEJO NEUROLOGICAL MEDICAL GROUP, INC., a California corporation; LOS ANGELES ORTHOPAEDIC INSTITUTE, INC., a California corporation; MEDICAL IMAGING MEDICAL GROUP, an unknown entity; MOUNTAIN VIEW SURGICAL CENTER, INC., a California corporation; CHARLES K. NEAL, an individual; QUEST DIAGNOSTICS WEST HILLS, a foreign Delaware corporation; SCREEN ACTORS GUILD, INC., a California corporation; THOUSAND OAKS SPINE MEDICAL GROUP, INC., a California corporation; STEVEN ZLATT, M.D., INC., a California corporation; OASIS LEGAL FINANCE, LLC, a foreign Illinois limited liability company; McDONALD CARANO WILSON LLP, a Nevada limited liability partnership; IMAGING CENTER OF THE VALLEY AT SHERMAN OAKS COMMUNITY HOSPITAL, LTD., A CALIFORNIA LP, a California limited partnership; VALLEY OPEN MRI, LLC, a California limited liability company; and DOES I-V, inclusive; and ROE CORPORATIONS VI-X, inclusive,

Defendants.

Case No.: A651563

Dept. No.: XXVIII

NOTICE OF ENTRY OF DEFAULT JUDGMENT AGAINST

- 1) LOS ANGELES ORTHOPAEDIC INSTITUTE INC.;
- 2) IMAGING CENTER OF THE VALLEY AT SHERMAN OAKS HOSPITAL, LTD., A CALIFORNIA LP;
- and
- 3) STEVEN ZLATT, M.D., INC.

1 McDONALD CARANO WILSON LLP, a Nevada
2 limited liability partnership,

3 Counterclaimant,

4 vs.

5 THE BOURASSA LAW GROUP, LLC, a Nevada
6 limited liability company; and DOES I-V,
7 inclusive; and ROE CORPORATIONS VI-X,
8 inclusive,

8 Counterclaim Defendants.

9 McDONALD CARANO WILSON LLP, a Nevada
10 limited liability partnership,

11 Cross-Claimant,

12 vs.

13 CALIFORNIA BACK SPECIALISTS MEDICAL
14 GROUP, INC., a California corporation;
15 CALIFORNIA MINIMALLY INVASIVE
16 SURGERY CENTER, an unknown entity;
17 CONEJO NEUROLOGICAL MEDICAL
18 GROUP, INC., a California corporation; LOS
19 ANGELES ORTHOPAEDIC INSTITUTE, INC.,
20 a California corporation; MEDICAL IMAGING
21 MEDICAL GROUP, an unknown entity;
22 MOUNTAIN VIEW SURGICAL CENTER, INC.,
23 a California corporation; CHARLES K. NEAL, an
24 individual; QUEST DIAGNOSTICS WEST
25 HILLS, a foreign Delaware corporation; SCREEN
26 ACTORS GUILD, INC., a California corporation;
27 THOUSAND OAKS SPINE MEDICAL GROUP,
28 INC., a California corporation; STEVEN ZLATT,
M.D., INC., a California corporation; OASIS
LEGAL FINANCE, LLC, a foreign Illinois limited
liability company; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS COMMUNITY
HOSPITAL, LTD., A CALIFORNIA LP, a
California limited partnership; VALLEY OPEN
MRI, LLC, a California limited liability company;
and DOES I-V, inclusive; and ROE
CORPORATIONS VI-X, inclusive,

Cross-Claim Defendants.

1 PLEASE TAKE NOTICE that on the 31st day of August 2012, Default Judgment was
2 entered against Defendants 1) Los Angeles Orthopaedic Institute Inc.; 2) Imaging Center of the
3 Valley at Sherman Oaks Hospital, Ltd., A California LP; and 3) Steven Zlatt, M.D., Inc. in the
4 above-captioned case. A copy of the Default Judgment is attached hereto as Exhibit A.

5 Dated: September 5, 2012.

6 McDONALD CARANO WILSON LLP

7
8 By: Patrick Murch
9 Patrick J. Murch, Esq. (#10162)
10 2300 West Sahara Avenue, Suite 1000
11 Las Vegas, Nevada 89102
12 *Attorneys for McDonald Carano Wilson LLP*
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of the law firm of McDonald Carano Wilson LLP, and that September 10, 2012, I caused true and correct copy of **NOTICE OF ENTRY OF DEFAULT JUDGMENT AGAINST 1) LOS ANGELES ORTHOPAEDIC INSTITUTE INC.; 2) IMAGING CENTER OF THE VALLEY AT SHERMAN OAKS HOSPITAL, LTD. A CALIFORNIA LP; and 3) STEVEN ZLATT, M.D., INC.** to be served, via United States Mail, upon the following:

Mark J. Bourassa, Esq.
Christopher W. Carson, Esq.
The Bourassa Law Group
3025 W. Sahara Ave., Suite 105
Las Vegas, NV 89102

Counsel for Plaintiff

Jeffrey A. Hechtman, Esq.
Horwood, Marcus & Berk, Chartered
500 West Madison Street, Suite 3700
Chicago, Illinois 60661

Michelle L. Abrams, Ltd
4750 West Flamingo Road, Suite B
Las Vegas, Nevada 89103

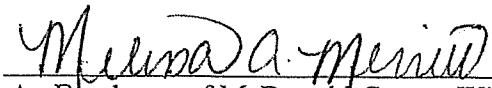
Counsel for Oasis Legal Finance, LLC

James Studer, Esq.
1420 East Los Angeles Avenue, Suite 203
Simi Valley, California 93065

Counsel for California Back Specialists Medical Group Inc., California Minimally Invasive Surgery Center, Conejo Neurological Medical Group, Inc., Medical Imaging Medical Group, and Thousand Oaks Spine Medical Group, Inc.

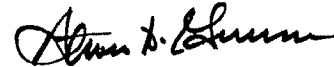
Jacqueline McQuigg, Esq.
2620 Regatta Drive
Las Vegas, Nevada 89128

Counsel for the Chiu Entities


An Employee of McDonald Carano Wilson LLP

260806

Exhibit D-4



CLERK OF THE COURT

1 NEO
2 MARK J. BOURASSA, ESQ.
3 Nevada Bar No. 7999
4 CHRISTOPHER W. CARSON, ESQ.
5 Nevada Bar No. 9523
6 THE BOURASSA LAW GROUP, LLC
7 8668 Spring Mountain Road, Suite 101
8 Las Vegas, Nevada 89117
9 Telephone: (702) 851-2180
10 Facsimile: (702) 851-2189
11 mbourassa@bourassalawgroup.com
12 ccarson@bourassalawgroup.com

13 *Attorneys for Plaintiff*

14 DISTRICT COURT
15 CLARK COUNTY, NEVADA

16 THE BOURASSA LAW GROUP, LLC,

17 Plaintiff,

18 vs.

CASE NO.: A651563

DEPT NO.: XXVIII

19 CALIFORNIA BACK SPECIALISTS
20 MEDICAL GROUP, INC., a California
21 Corporation; CALIFORNIA MINIMALLY
22 INVASIVE SURGERY CENTER, an
23 unknown entity; CONEJO NEUROLOGICAL
24 MEDICAL GROUP, INC., a California
25 Corporation; LOS ANGELES
26 ORTHOPAEDIC INSTITUTE, INC., a
27 California Corporation; MEDICAL
28 IMAGING MEDICAL GROUP, an unknown
entity; MOUNTAIN VIEW SURGICAL
CENTER, INC., a California Corporation;
CHARLES K. NEAL, an individual; QUEST
DIAGNOSTICS WEST HILLS, a foreign
Delaware Corporation; SCREEN ACTORS
GUILD, INC., a California Corporation;
THOUSAND OAKS SPINE MEDICAL
GROUP, INC., a California Corporation;
STEVEN ZLATT, M.D., INC., a California
Corporation; OASIS LEGAL FINANCE,
LLC, a foreign Illinois Limited Liability
Company; McDONALD, CARANO
WILSON LLP, a Nevada Limited Liability
Partnership; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS
COMMUNITY HOSPITAL, LTD, A
CALIFORNIA LP, a California Limited
Partnership; VALLEY OPEN MRI, LLC, a

NOTICE OF ENTRY OF ORDER
GRANTING PLAINTIFF'S MOTION
FOR DISBURSEMENT OF
INTERPLEADER FUNDS;

and

DENYING McDONALD CARANO
WILSON LLP'S COUNTERMOTION
FOR ADJUDICATION OF
ATTORNEY'S LIEN AND
DISBURSEMENT OF
INTERPLEADER FUNDS

1 California Limited Liability Company; and
2 DOES I-V, inclusive; and ROE
3 CORPORATIONS VI-X, inclusive,

4 Defendants.

5
6 **NOTICE OF ENTRY OF ORDER GRANTING PLAINTIFF'S MOTION FOR**
7 **DISBURSEMENT OF INTERPLEADER FUNDS; and**
8 **DENYING McDONALD CARANO WILSON LLP'S COUNTERMOTION FOR**
9 **ADJUDICATION OF ATTORNEY'S LIEN AND DISBURSEMENT OF**
10 **INTERPLEADER FUNDS**

11 PLEASE TAKE NOTICE that on or about September 12, 2013 an order was entered
12 Granting Plaintiff's Motion for Distribution of Interpleader Funds and Denying McDonald
13 Carano Wilson LLP's Countermotion for Adjudication of Attorney's Lien and Disbursement of
14 Interpleader Funds in the above entitled matter. A copy of the order is attached hereto as Exhibit
15 1.

16 Dated this 16th day of September 2013.

17
18 **THE BOURASSA LAW GROUP, LLC**

19 */s/ Mark J. Bourassa*

20 **MARK J. BOURASSA, ESQ.**
21 Nevada Bar No. 7999
22 **CHRISTOPHER W. CARSON, ESQ.**
23 Nevada Bar No. 9523
24 8668 Spring Mountain Road, Suite 101
25 Las Vegas, Nevada 89117
26 Tel: (702) 851-2180
27 Fax: (702) 851-2189
28 *Attorneys for Plaintiff*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 16th day of September 2013 I served a true and correct copy of the foregoing document entitled **NOTICE OF ENTRY OF ORDER GRANTING PLAINTIFF'S MOTION FOR DISBURSEMENT OF INTERPLEADER FUNDS; and DENYING McDONALD CARANO WILSON LLP'S COUNTERMOTION FOR ADJUDICATION OF ATTORNEY'S LIEN AND DISBURSEMENT OF INTERPLEADER FUNDS** via first class, United States mail, postage prepaid addressed to the following persons:

Michelle L. Abrams, Esq.
4750 W. Flamingo Rd. Ste. B
Las Vegas, NV 89103
Attorney for Oasis Legal Finance, LLC.

Patrick J. Murch, Esq.
McDonald Carano Wilson LLP
2300 W. Sahara Ave., #10 Suite 1000
Las Vegas, NV 89102
Attorneys for McDonald Carano Wilson LLP

Jacqueline Mary McQuigg, Esq.
2620 Regatta Dr., Ste. 102
Las Vegas, NV 89128
Attorney for the Chiu Entities

James T. Studer, Esq.
1420 Los Angeles Avenue, Ste 203
Simi Valley, CA 93065
Attorney for the Chiu Entities

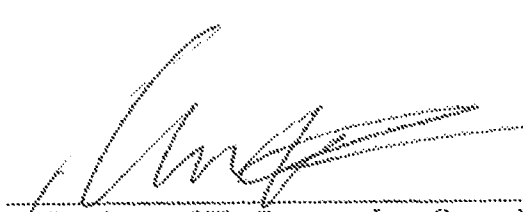

An Employee of The Bourassa Law Group, LLC

Exhibit D-5

NTSO
GEORGE F. OGILVIE III, ESQ.
Nevada Bar No. 3552
PATRICK J. MURCH, ESQ.
Nevada Bar No. 10162
MCDONALD CARANO WILSON LLP
2300 West Sahara Avenue, Suite 1200
Las Vegas, Nevada 89102
pmurch@mcdonaldcarano.com
Telephone: (702) 873-4100
Facsimile: (702) 873-9966
Attorneys for McDonald Carano Wilson LLP

Electronically Filed
12/11/2013 09:26:31 AM


CLERK OF THE COURT

DISTRICT COURT
CLARK COUNTY, NEVADA

THE BOURASSA LAW GROUP, LLC
Plaintiff,

Case No.: A-11-651563-C
Dept. No.: XXVIII

vs.

**NOTICE OF ENTRY OF STIPULATION
AND AMENDED ORDER GRANTING
THE BOURASSA LAW GROUP LLC'S
MOTION FOR DISBURSEMENT OF
INTERPLEADER FUNDS;**

AND

**DENYING MCDONALD CARANO
WILSON LLP'S COUNTERMOTION FOR
ADJUDICATION OF ATTORNEY'S LIEN
AND DISBURSEMENT OF
INTERPLEADER FUNDS**

CALIFORNIA BACK SPECIALISTS MEDICAL
GROUP, INC., a California corporation;
CALIFORNIA MINIMALLY INVASIVE
SURGERY CENTER, an unknown entity;
CONEJO NEUROLOGICAL MEDICAL
GROUP, INC., a California corporation; LOS
ANGELES ORTHOPAEDIC INSTITUTE, INC.,
a California corporation; MEDICAL IMAGING
MEDICAL GROUP, an unknown entity;
MOUNTAIN VIEW SURGICAL CENTER, INC.,
a California corporation; CHARLES K. NEAL, an
individual; QUEST DIAGNOSTICS WEST
HILLS, a foreign Delaware corporation; SCREEN
ACTORS GUILD, INC., a California corporation;
THOUSAND OAKS SPINE MEDICAL GROUP,
INC., a California corporation; STEVEN ZLATT,
M.D., INC., a California corporation; OASIS
LEGAL FINANCE, LLC, a foreign Illinois limited
liability company; MCDONALD CARANO
WILSON LLP, a Nevada limited liability
partnership; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS COMMUNITY
HOSPITAL, LTD., A CALIFORNIA LP, a
California limited partnership; VALLEY OPEN
MRI, LLC, a California limited liability company;
and DOES I-V, inclusive; and ROE
CORPORATIONS VI-X, inclusive,

Defendants.

1 McDONALD CARANO WILSON LLP, a Nevada
2 limited liability partnership,

3 Counterclaimant,

4 vs.

5 THE BOURASSA LAW GROUP, LLC, a Nevada
6 limited liability company; and DOES I-V,
7 inclusive; and ROE CORPORATIONS VI-X,
8 inclusive,

8 Counterclaim Defendants.

9 McDONALD CARANO WILSON LLP, a Nevada
10 limited liability partnership,

11 Cross-Claimant,

12 vs.

13 CALIFORNIA BACK SPECIALISTS MEDICAL
14 GROUP, INC., a California corporation;
15 CALIFORNIA MINIMALLY INVASIVE
16 SURGERY CENTER, an unknown entity;
17 CONEJO NEUROLOGICAL MEDICAL
18 GROUP, INC., a California corporation; LOS
19 ANGELES ORTHOPAEDIC INSTITUTE, INC.,
20 a California corporation; MEDICAL IMAGING
21 MEDICAL GROUP, an unknown entity;
22 MOUNTAIN VIEW SURGICAL CENTER, INC.,
23 a California corporation; CHARLES K. NEAL, an
24 individual; QUEST DIAGNOSTICS WEST
25 HILLS, a foreign Delaware corporation; SCREEN
26 ACTORS GUILD, INC., a California corporation;
27 THOUSAND OAKS SPINE MEDICAL GROUP,
28 INC., a California corporation; STEVEN ZLATT,
M.D., INC., a California corporation; OASIS
LEGAL FINANCE, LLC, a foreign Illinois limited
liability company; IMAGING CENTER OF THE
VALLEY AT SHERMAN OAKS COMMUNITY
HOSPITAL, LTD., A CALIFORNIA LP, a
California limited partnership; VALLEY OPEN
MRI, LLC, a California limited liability company;
and DOES I-V, inclusive; and ROE
CORPORATIONS VI-X, inclusive,

Cross-Claim Defendants.

1 TO: ALL PARTIES AND THEIR COUNSEL OF RECORD:
2 PLEASE TAKE NOTICE that a **STIPULATION AND AMENDED ORDER**
3 **GRANTING THE BOURASSA LAW GROUP LLC'S MOTION FOR DISBURSEMENT**
4 **OF INTERPLEADER FUNDS; AND DENYING MCDONALD CARANO WILSON LLP'S**
5 **COUNTERMOTION FOR ADJUDICATION OF ATTORNEY'S LIEN AND**
6 **DISBURSEMENT OF INTERPLEADER FUNDS** was entered on December 9, 2013. A true
7 and correct copy of the Stipulation and Order is attached as Exhibit A.

8 Dated: December 10, 2013.

9 MCDONALD CARANO WILSON LLP

10 By: /s/ Patrick J. Murch
11 George F. Ogilvie III, Esq. (#3552)
12 Patrick J. Murch, Esq. (#10162)
13 2300 West Sahara Avenue, Suite 1200
14 Las Vegas, Nevada 89102
15 *Attorneys for McDonald Carano Wilson LLP*

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the law firm of McDonald Carano Wilson LLP, and, on December 10, 2013, I caused a copy of the foregoing **NOTICE OF ENTRY OF STIPULATION AND AMENDED ORDER GRANTING THE BOURASSA LAW GROUP LLC'S MOTION FOR DISBURSEMENT OF INTERPLEADER FUNDS; AND DENYING MCDONALDCARANO WILSON LLP'S COUNTERMOTION FOR ADJUDICATION OF ATTORNEY'S LIEN AND DISBURSEMENT OF INTERPLEADER FUNDS** to be served, via U.S. Mail, upon the following:

Michelle L. Abrams, Esq.
Abrams Probate & Planning Group
530 South Fourth Street
Las Vegas, Nevada 89101
Attorneys for Oasis Legal Finance, LLC

Jacqueline Mary McQuigg, Esq.
Law Offices of Jacqueline Mary McQuigg, Esq.
2620 Regatta Drive, Suite 102
Las Vegas, Nevada 89128
Attorneys for the Chiu Entities

Mark J. Bourassa, Esq.
Christopher W. Carson, Esq.
The Bourassa Law Group, LLC
8668 Spring Mountain Road, Suite 101
Las Vegas, Nevada 89117
Attorneys for Plaintiff

James T. Studer, Esq.
James Studer & Associates
1420 Los Angeles Avenue, Suite 203
Simi Valley, California 93065
Attorneys for the Chiu Entities

/s/ Melissa A. Merrill
An employee of McDonald Carano Wilson LLP

293853.1